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  ☐ Southcentral

County 1 (Primary Dispensary Location): Westmoreland
County 2 (if applicable): Allegheny
County 3 (if applicable): Butler

Pennsylvania Department of Health
Medical Marijuana 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

<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>
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</thead>
<tbody>
<tr>
<td>Keystone Integrated Care, LLC</td>
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<table>
<thead>
<tr>
<th>Other trade names and DBA (doing business as) names:</th>
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<tr>
<td>N/A</td>
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</table>

<table>
<thead>
<tr>
<th>Business Address: 5513 William Flynn Hwy, Suite 400, #230</th>
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<tbody>
<tr>
<td>City: Gibsonia</td>
</tr>
<tr>
<td>Phone: 844-563-2837</td>
</tr>
</tbody>
</table>

☑️ Primary Contact, or ☐ Registered Agent for this Application

<table>
<thead>
<tr>
<th>Name: [Redacted]</th>
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<tbody>
<tr>
<td>Address: [Redacted]</td>
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<tr>
<td>City: Gibsonia</td>
</tr>
<tr>
<td>Phone: [Redacted]</td>
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</tbody>
</table>

Section 2 – Dispensary Information

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

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

☑️ Yes ☐ No

Primary Dispensary Location (please indicate dispensary name as you would like it to appear on the dispensary permit)

<table>
<thead>
<tr>
<th>Facility Name: Keystone Integrated Care, LLC</th>
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</thead>
<tbody>
<tr>
<td>Address: 303 East Pittsburgh St</td>
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<tr>
<td>City: Greensburg</td>
</tr>
<tr>
<td>County: Westmoreland</td>
</tr>
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</table>
Summary

This response will provide a description of the public access at the company’s Greensburg Dispensary location, including all local public transportation that is available. The company’s Greensburg Dispensary will be its primary dispensary location.

Location – Region 5, Westmoreland County

303 East Pittsburgh Street, Greensburg, Pennsylvania 15601

Summary of the Site

The company’s Greensburg Dispensary is located on the eastern edge of the downtown commercial business district and on the City’s Gateway Zoning Overlay District along U.S. Route 30/Pittsburgh Street, and will meet the same municipal zoning and land use requirements as other commercial facilities located in the same zoning district §1141.49.

- The general neighborhood consists primarily of commercially zoned properties with some residential properties and is compliant with §1161.26(b)(1), as no schools or child-care facilities are within 1000 feet, property line to property, of the proposed dispensary location.
- To encourage private investment in commercial properties and business operations, the City of Greensburg approved a LERTA District, a Façade Grant Improvement Program, a Main Street District, Health Care Revitalization District and the Greensburg Fund. These programs and initiatives are intended to remove blight, increase real estate values, and create job opportunities within the city of Greensburg.

The location of the company’s Greensburg Dispensary at 303 East Pittsburgh Street, City of Greensburg was chosen to maximize patient access to medical marijuana by Westmoreland County residents because of the:

- Highway and road network connecting Westmoreland County with the City of Greensburg,
- Westmoreland County Transit Authority fixed bus route system and assisted transit services for seniors and disabled residents,
- City’s sidewalk network and crosswalk enhancements, and
- City’s bike trail that connects with five adjacent municipalities.

[Redacted]

Dispensary Description

The company’s Greensburg Dispensary will be a newly constructed, single-story, 2,983 square foot building incorporating clean metal panel, light stucco and brick materials.

- Patients will access the property from North Urania Avenue into the parking lot and exit out
onto George Street.

- The entire rear length of the building spans along East Pittsburgh Street with an open, sunny façade and a two-story, glass framed mezzanine at the corner of East Pittsburgh and Urania Streets will create a light but dominant and welcome presence to that intersection.

The building's main entrance is from the parking lot immediately into a security vestibule where patients will be screened by security officials.

- After being cleared for entrance into the dispensary, patients will enter the waiting area possessing leisure and educational reading material, a flat screen television, and WiFi internet access with 14 person seating capacity. If the number of patients exceeds the capacity of the waiting area, patients will be seated in the security vestibule until a seat becomes available in the waiting area.
- From there, new patients visiting the dispensary for the first time will be seen by a Patient Coordinator in any one of three, private consulting offices and then will be introduced by the Patient Coordinator to the appropriate medical marijuana products at the central dispensary counter.
- Patients, after purchasing medicine, will exit from the same door that they entered.

[Redacted]

[Redacted]

[Redacted]

The dispensary site will have a surface parking lot adjacent to the building containing 11 patient parking spaces with 2 ADA compliant that is accessible to the dispensary entrance. Employee parking will be in the neighborhood at a private lot 500 feet from the dispensary.

An enclosed secured loading dock will be built at the far end of the building, out of public sight, with a private entrance for the shipping and receiving of medical marijuana – §1161.26(f).

Sustainable features that will be incorporated into the building design include:

- Natural daylight will fill the dispensary area from the southern facing East Pittsburgh Street exposure.
- White TPO rooftop materials that feature heat-welded seam integrity and heat reflecting technology.
- Metal composite wall panels with advanced thermal and moisture protection properties.
- Energy efficient furnace and appliances.

[Redacted]

Public Access

Residents of Westmoreland County may access the Greensburg Dispensary by using several
transportation methods including private car, buses, ride-share services, AMTRAK train, bicycle, and sidewalks. A majority of Westmoreland County residents will use a private car or a scheduled/dedicated public transportation service to reach the dispensary via local, state and interstate roads.

**Highway Access**

Westmoreland County residents traveling to the Greensburg Dispensary have access to a road network combination consisting of low volume municipal streets/roads that connect to higher volume US and PA Routes as well as nearby Interstate highways. The City of Greensburg is centrally located within Westmoreland County and at the intersection of six US and Pennsylvania routes traversing the County:

- US Route 30
- US Route 119
- PA Route 66
- PA Route 819
- PA Route 130
- PA Route 136.

These routes also connect with other road networks extending across Westmoreland County including:

- US Route 22
- PA Route 356
- PA Route 366
- Interstate 70
- Interstate 76.

The population of Westmoreland County is 357,956 with total households being 149,360. Considering a drive time of between 20 to 30 minutes from their home to the company’s Greensburg Dispensary, a total of 299,444 residents (83.6% of the county population) or 126,210 households (84.5% of the county households) can reach the company’s Greensburg Dispensary location within 30 minutes. With a 20-minute drive time or less, the 303 East Pittsburgh Street site can be reached by 159,353 residents (44.5% of the county population) or 66,864 households (44.7% of the county households).

**US ROUTE 30**

US Route 30 is a **primary east-west corridor stretching 40 miles** across the middle portion of Westmoreland County. Part of the National Highway System, the US Route 30 Corridor is a **belt of growth in Westmoreland County**. From west to east, the communities with access to the corridor transition from urban and suburban to rural characteristics.

At the municipal borders of the City of Greensburg, US Route 30 separates to service downtown Greensburg on Pittsburgh Street and to provide a bypass for residents traversing the County. The
bypass at Greensburg has a 44,000-daily traffic count at the intersection with US Route 119 and the Pittsburgh Street route to reach downtown Greensburg has a 13,000-daily traffic count at the intersection of Urania Avenue.

According to the 2010 U.S. Census, these municipalities along the US Route 30 corridor had a population of 161,475, representing 43.6% of the total population in Westmoreland County. Since 1960, the population in these municipalities increased by 8.6 percent, while the Westmoreland County population grew by 4.9 percent. US Route 30 extends through the communities of North Huntingdon Township, Irwin Borough, Hempfield Township, the City of Greensburg, Southwest Greensburg Borough, South Greensburg Borough, Unity Township, and Ligonier Township. The corridor also provides access to a number of nearby communities including the City of Jeannette, the City of Latrobe, Ligonier Borough, and Laurel Mountain Borough. The Westmoreland Transit Authority utilizes US Route 30 for many of its bus routes.

The company’s Greensburg Dispensary is 1.1 miles from the intersection of US Route 30 bypass and East Pittsburgh Street/US Route 30 providing access to Westmoreland County residents living along this highway corridor.

**US ROUTE 119**
US Route 119 is one of three north-south roads passing through the City of Greensburg with the others being PA Route 66 and PA Route 819 from the southern border of Westmoreland County to the City of Greensburg before exiting into Armstrong County. US Route 119 at Greensburg’s northern municipal border has a daily traffic count of 10,000 vehicles. Approaching the City of Greensburg from the south at the intersection with US Route 30, the daily traffic count is 24,000 vehicles for US Route 119.

According to the 2010 U.S. Census, these municipalities along the US Route 119 corridor had a population of 142,014, representing 39.6% of the total population in Westmoreland County. US Route 119 extends through the communities of East Huntingdon Township, Hempfield Township, Salem Township, Derry Township, New Stanton Borough, Youngwood Borough, the City of Greensburg, Southwest Greensburg Borough, South Greensburg, and New Alexandra Borough. The corridor also provides access to a number of nearby communities including Scottdale Borough, Mount Pleasant Borough, Mount Pleasant Township, Unity Township, and Loyalhanna Township.

The company’s Greensburg Dispensary is 794 feet from the intersection of US Route 119 and East Pittsburgh Street/US Route 30 providing access to Westmoreland County residents living along this route.

[Redacted]

**PA ROUTE 819**
US Route 819 is a north-south road passing through the City of Greensburg. US Route 819 at
Greensburg’s northern municipal border has a daily traffic count of 4,900 vehicles. Approaching the City of Greensburg from the south at the intersection with US Route 30, the daily traffic count is 4,900 vehicles for US Route 819. According to the 2010 U.S. Census, these municipalities along the US Route 819 corridor had a population of 132,998, representing 37.1% of the total population in Westmoreland County.

US Route 819 extends through the communities of Scottdale Borough, East Huntingdon Township, Mount Pleasant, Hempfield Township, Salem Township, Bell Township, Mount Pleasant Borough, the City of Greensburg, Southwest Greensburg Borough, South Greensburg, and Avonmore Borough. The corridor also provides access to a number of nearby communities including New Stanton Borough, Youngwood Borough, Delmont Borough, Unity Township, and Loyalhanna Township.

The company’s Greensburg Dispensary is 794 feet from the intersection of US Route 819/US Route 119 and East Pittsburgh Street/US Route 30 providing access to Westmoreland County residents living along this route.

**PA ROUTE 66**

PA Route 66 is a north-south road passing through the City of Greensburg with Route 66 Toll Road bypassing Greensburg to the west of the municipality. PA Route 66 Business and Toll Road starts at the intersection of Interstate 70, Interstate 76 and US Route 119 in New Stanton Borough and proceeds north through Westmoreland County before terminating in Kane, PA. PA Route 66 at Greensburg’s northern municipal border has a daily traffic count of 11,000 vehicles. Approaching the city of Greensburg from the south at the intersection with US Route 30, the daily traffic count is 24,000 vehicles for PA Route 66/US Route 119. According to the 2010 U.S. Census, these municipalities along the PA Route 66 corridor had a population of 165,579, representing 46.2% of the total population in Westmoreland County.

PA Route 66 extends through the communities of New Stanton Borough, Youngwood Borough, Hempfield Township, Salem Township, Penn Township, Delmont Borough, Municipality of Murrysville, the City of Greensburg, Southwest Greensburg Borough, South Greensburg, Washington Township and Apollo Borough. The corridor also provides access to a number of nearby communities including South Huntingdon Township, Sewickley Township, City of Jeannette, Upper Burrell Township, Allegheny Township, and Vandergrift Borough and Bell Township.

The company’s Greensburg Dispensary is 1,840 feet from the intersection of PA Route 66/US Route 819/US Route 119 and East Pittsburgh Street/US Route 30 providing access to Westmoreland County residents living along this route.

[Redacted]

**PA ROUTE 130**

PA Route 130 is an east-west road passing through the City of Greensburg before terminating at the
intersection of PA Route 381 near Kregar, Westmoreland County. The route enters the western border of Westmoreland County at Trafford Borough and continues through suburban Penn Township, before passing through the industrial town of Jeannette, and then entering Greensburg. According to the 2010 U.S. Census, these municipalities along the PA Route 130 corridor had a population of 102,277, representing 28.5% of the total population in Westmoreland County.

PA Route 130 at Greensburg’s western municipal border has a daily traffic count of 11,000 vehicles. Approaching the city of Greensburg from the east at the intersection with Pittsburgh Street/US Route 30, the daily traffic count is 8,400 vehicles for PA Route 130. PA Route 130 passes the company’s Greensburg Dispensary before journeying through heavily suburbanized Hempfield Township and then passing through Unity Township and Mount Pleasant Township and then reaching the very rural area of Cook Township at the foothills of the Laurel Highlands.

PA Route 130 passes the company’s Greensburg Dispensary at the intersection of Urania Avenue.

**PA ROUTE 136**

PA Route 136 is an east-west road entering the western border of Westmoreland County at Rostraver Township and terminating in the city of Greensburg at the intersection of US Route 30. According to the 2010 U.S. Census, these municipalities along the PA Route 136 corridor had a population of 84,688, representing 23.6% of the total population in Westmoreland County. Residents reach downtown Greensburg by proceeding on West Newton Street to Pittsburgh Street and then towards Main Street.

Upon entering Westmoreland County, the route passes through West Newton Borough, South Huntingdon Township, Sewickley Township, Hempfield Township, Arona Borough, and Madison Borough. PA Route 136 at Greensburg’s western municipal border has a daily traffic count of 9,100 vehicles.

The company’s Greensburg Dispensary is 1.2 miles from the intersection of US Route 30 and PA Route 136.

**Public Transportation**

The company has chosen its Greensburg Dispensary location specifically because of its access to public transportation.

**WESTMORELAND COUNTY TRANSIT AUTHORITY**

Westmoreland County Transit Authority (WCTA) has provided public transportation services for residents of Westmoreland County since 1978. Westmoreland Transit currently owns and oversees the operation of a fleet of 41 buses ranging from small 28 passenger buses to 45-foot deluxe road coaches. The WCTA has developed 24 bus routes providing transportation for residents to reach destination points both within and outside Westmoreland County. WCTA reports total ridership for all WCTA routes was 505,618 in 2015-16. Passengers board and depart the bus at designated stops along
the route so to maintain the bus’s time schedule.

[Redacted]

The WCTA Flyer routes travel between Westmoreland County communities to downtown Pittsburgh and Oakland for residents working outside the County. The morning Flyer travels west to Pittsburgh and Oakland with the returning afternoon and evening routes traveling east to Westmoreland County and the City of Greensburg.

The WCTA’s intra-County routes provide service within a specific area or to and from Greensburg with the WCTA station at 41 Bell Way serving as the hub. The specific routes starting or ending at the WCTA station are:

- Route 5 & 5S - Greensburg and Jeannette.
- Route 6 - Greensburg and Irwin.
- Route 8 - Greensburg, Youngwood, New Stanton, and Mt. Pleasant.
- Route 12 - Greensburg and New Kensington.
- Route 16 - Greensburg and Mt. Pleasant.
- Route 16S - Greensburg and Scottdale.
- Route 18 - Irwin and Greensburg Flyer.

The company’s Greensburg Dispensary is 350 feet from the WCTA stop at the corner of Highland Avenue and West Pittsburgh Street.

The WCTA bus Routes 9, 9S and 9A & 9AS – Greensburg and Latrobe and Derry Shopper have multiple daily stops at this designated location as the bus passes seven times heading east and six times heading west on the Monday thru Friday schedule. The Saturday bus service for Route 9S and 9AS passes the Greensburg Dispensary four times heading east from the Transit Station and then returns west to the City of Greensburg. WCTA Route 20F has two weekday trips with one trip departing Ligonier and arriving at East Pittsburgh Street at 8:00 AM and one trip that departs the Transit Center at 4:40 PM and arrives in Ligonier.

WCTA reports the total fixed route ridership:

- 45,200 - total ridership (2015-16) for weekday Route 9 Greensburg and Latrobe and Derry.
- 6,713 - total ridership (2015-16) for Saturday Route 9S Greensburg and Latrobe and Derry.
- 3,310 - total ridership (2015-16) for weekday Route 20F Greensburg to Ligonier.

**GO Westmoreland Transportation Services**

GO Westmoreland (GO) provides transportation services for residents of Westmoreland County requiring special assistance because of limited mobility or 65+ years of age. Often the fare is free or discounted for eligible riders compared to regular bus service fare rates. Residents must register with GO to confirm eligibility for special transportation services. Once registered, residents may ride for free on fixed-route WCTA public bus services to gain access to the company’s Greensburg Dispensary.
WCTA reports the GO Westmoreland trip total for senior and disabled ridership as 75,091 in 2015-16 which is a 16% increase from the previous year.

**Medical Assistance Transportation Program (MATP)**
Westmoreland County residents with a valid Medical Assistance card are eligible to utilize the MATP. MATP is coordinated by WCTA and funded by the PA Department of Public Welfare. Transportation is free to medical appointments, the pharmacy, and other MA-billable service destinations. Rides are provided by bus, taxi, or wheelchair accessible van, depending on rider mobility.

**WCTA-Senior Shared-Ride Transportation Services**
The WCTA senior program provides transportation to residents of Westmoreland County who are 65 or older. The Pennsylvania State Lottery provides funding for this program. Trips can be taken for any purpose with this program allowing older adults to travel safely, no matter the occasion, to visit a doctor, hospital, the grocery store, or even the hair salon. Older adults who are independent and active can confidently get to their destination at a more affordable rate than other alternatives. Riders must complete an application with GO to access this transportation service. Once registered, residents who are 65 or older may use this service to access the Greensburg Dispensary.

**Americans with Disabilities Paratransit Service**
As required by the Americans with Disabilities Act, GO provides paratransit service for eligible residents living within the public bus service areas of Westmoreland County. The paratransit service will be provided to all individuals certified as eligible, from origins and destination within 3/4 mile corridors of existing bus routes and during the same times of operation. Most communities have Monday through Friday service, although there are a few areas where bus service operates only 2 or 3 times per week. Saturday service is limited. This service allows paraplegic residents with a way to access the Greensburg Dispensary.

**Transportation for Persons with Disabilities Program**
The goals of the Persons with Disabilities program are to provide shared-ride service for persons who have a disability and are ages 18 to 64, living in Westmoreland County, and needing transportation to or from an area not served by existing transportation services. Eligibility requirements are: residents are between 18 and 64 years of age, possess a disability as defined by the Americans with Disabilities Act (ADA) and verified by a physician, and registered with GO. Ensuring residents with disabilities also have access to the Greensburg Dispensary.

**WESTMORELAND COUNTY AREA AGENCY ON AGING (AAA)-PRIORITY TRANSPORTATION PROGRAM**
When older adults (65+) register with the AAA, they can receive additional savings when traveling to certain destinations within Westmoreland County. An additional 10% can be saved when traveling to: Medical appointments, Senior Centers, Senior Center based shopping, AAA Adult Day Care, and AAA Vision Centers, providing another way for residents over the age of 65 to access the Greensburg
Pedestrian and Bike Networks
For those more able-bodied residents, there is a network of pedestrian and bike paths providing access to the Greensburg Dispensary.

**Sidewalk Network:** The City of Greensburg has a well-developed sidewalk network that is utilized by both residents and visitors. The downtown area along with the seven surrounding neighborhoods has a sidewalk network as part of the infrastructure for safe pedestrian movement. The adjacent communities of Southwest Greensburg Borough and South Greensburg Borough also have a sidewalk network that connects with the city of Greensburg.

Within downtown Greensburg, many of the signalized intersections possess crosswalk signals and curb cuts for motorized wheel chairs. PennDoT District 12 will upgrade all traffic lights and crosswalk signals at 20 intersections along Pittsburgh and Otterman Street from the eastern municipal border to the western border to improve vehicular and pedestrian movement within the Pittsburgh/Otterman/US Route 30 corridor.

The City of Greensburg Planning and Development Department requires installation of intersection curb cuts when replacing/repairing the sidewalk or when a commercial and residential property is sold. The intent is to improve pedestrian movement within the municipality. The company will ensure to build ample sidewalk access, including handicap accessible entry ways, to its Greensburg Dispensary.

TransAssociates Engineering Consultants completed an assessment of traffic, pedestrian and bike movement within the Pittsburgh/Otterman/US Route 30 corridor. The AM Midblock Pedestrian counts were 12 people at Highland Avenue, seven people at Urania Avenue, and 24 people at Arch Avenue during a one-hour capture period. The PM Midblock Pedestrian counts were 21 people at Highland Avenue, 33 people at Urania Avenue, and 48 people at Arch Avenue during a one-hour capture period. These midblock crossings are located within an 850 feet radius of the Greensburg Dispensary.

Five Star Trail Network: The Five Star Trail is a rail with trail that connects five municipalities from Lynch Field in Greensburg to Youngwood to Armbrust and is located along the Southwestern Pennsylvania Railroad corridor. The trail’s flat surface is use by residents for walking, jogging, biking, and cross-country skiing. It is handicapped accessible and accommodates everyone regardless of age or physical ability.

The Five Star Trail has two access points located near the Greensburg Dispensary; the northern access
point is 500 feet away and the southern access point is 768 feet away.

TransAssociates Engineering Consultants completed an assessment of traffic, pedestrian and bike movement within the Pittsburgh/Otterman/US Route 30 corridor as part of the Greensburg Healthcare District Smart Transportation Improvement Study for PennDOT District 12. During a three-day study period from 6:00AM to 8:00PM, a total of 827 pedestrians and 237 cyclists crossed the Pittsburgh Street/US Route 30 overpass at the Highland Avenue intersection. This Five Star Trail overpass is located 230 feet from the Greensburg Dispensary.

**Greensburg Bike Lane Network:** The City of Greensburg is working with PennDOT District 12 to create a bike lane network within the municipality that connects the city’s neighborhoods with the downtown and community assets. The bike lane network will consist of an east-west and north-south loops. The east-west route will be a dedicated lane along Pittsburgh and Otterman Streets/US Route 30 separating cyclists from vehicles by delineators installed on the road. This loop will start at the intersection of Washington Avenue and Pittsburgh Street/US Route 30 and proceed east to the intersection of Urania Avenue and Pittsburgh Street/US Route 30 before returning west to Washington Avenue on Otterman Street / US Route 30. The north-south route will be a bike/vehicle lane that starts at Depot Street and Ludwick Avenue and proceeds south through the City’s 5th and 6th Ward neighborhoods to the Five Star Trail at the Mt. Pleasant Road trail access point and then returns north to the Depot Street and Ludwick Avenue intersection on the same bike/vehicle lane. The intersection of Urania Avenue and Pittsburgh Street / US Route 30 is the location of the Greensburg Dispensary.

**Train Service**

AMTRAK provides daily east bound and west bound passenger rail service to and from the city of Greensburg (AMTRAK – Greensburg, PA (GNB)) on the Pennsylvanian. The Pennsylvanian travels daily between New York City and Pittsburgh with the east bound stop at 8:10 AM and the west bound stop at 6:30 PM Monday thru Saturday and Sunday east bound stop at 1:45 PM and west bound stop at 6:30 PM. The Pennsylvania stops at the neighboring Western Pennsylvania communities of Pittsburgh, Latrobe, Johnstown, and Altoona. The platform is covered and ADA accessible from Harrison Avenue. The 2007 economic impact study commissioned by the Westmoreland Trust noted the annual AMTRAK passenger count was 13,000 riders at the Greensburg Train Station. The Greensburg Train Station is located one-block from the WCTA and GO bus terminal at 41 Bell Way, which is the main public transit hub to the Greensburg Dispensary.

**Uber / Taxi Service**

**Taxi Service:** Westmoreland County residents have access to five taxi service companies which can provide scheduled transportation service to the Greensburg Dispensary. The taxi service companies are Byers Taxi Service, Vandergrift, Veteran’s Cab Company, Latrobe, Mt. Pleasant Yellow Cab, Mt.
Pleasant, Manor Valley Tax, Irwin, and Valley Transportation, Latrobe.

**UBER:** UBER established service in Westmoreland County on August 4, 2016. UBER is an on-demand private car service individuals confirm by using a location based app installed on their phone. It is an alternative transportation option available to Westmoreland County residents to augment the public transportation system of local and commuter buses. Residents use UBER to fill a gap left when most taxi service was halted about two years ago in the Greensburg and Jeannette areas.

### Site Description

The company’s Greensburg Dispensary is positioned at the eastern edge of [DOH REDACTED] and 500’ from the western edge of [DOH REDACTED]. The general characteristic of [DOH REDACTED] is the City’s central business district and the 5th Ward neighborhood with 70% of the properties being a commercial classification and 30% being single or multi-family residential. The central business district contains the Westmoreland County Courthouse, the Palace Theatre, Seton Hill University academic buildings and independently owned retail and service businesses with a high concentration of churches and non-profit organizations. The primary U.S. Routes of 30 and 119 and PA Routes 66, 130, and 819 serving Westmoreland County residents converge at the Courthouse. The general characteristic of [DOH REDACTED] is the City’s eastern neighborhood primarily consisting of residential housing stock representing 80% of the parcels and divided by the commercial corridor of U.S. Route 30/Pittsburgh Street representing 20% of the parcels.

The company’s Greensburg Dispensary on the primary east-west U.S. Route 30/Pittsburgh Street leading into the downtown area from the eastern communities of Westmoreland County. The WCTA has several bus routes that use U.S. Route 30/Pittsburgh Street to reach the Transition Station in downtown Greensburg from the eastern Westmoreland County communities.

Within a four-block radius of the company’s Greensburg Dispensary are primarily commercially zoned properties with a few residential properties. The Greensburg Shopping Plaza is 95% leased with the mix being national retail stores as plaza anchors surrounded by locally owned service and professional businesses. Other nearby commercial properties contain a gas station/convenience store, hardware store, bar/restaurant, bridal/formal wear store, auto repair business, bike shop, home décor shop, legal services and home theatre system store. The adjacent commercial properties contain a Rite Aid, The Dancer’s Closet, Christian Laymen’s Outlet, an auto repair shop and a dental practice.

The City of Greensburg Bike Lane Network will terminate the eastern loop on Pittsburgh Street at the intersection of East Pittsburgh Street and Urania Avenue which is the company’s Greensburg location. Cyclists will proceed to their end destination on existing city streets or access the Five Star Trail.

### Zoning Regulations and Building Permitting

The company’s Greensburg Dispensary is located within an Industrial District (M District) because of the proximity to the Southwest Pennsylvania Railroad line crossing U.S. Route 30/Pittsburgh Street,
350 feet from the dispensary site. The acquisition of the adjacent parcel, zoned R2-General Residence District (R2 District), will expand the site footprint for the construction of the dispensary building and supporting parking lot. The City’s Gateway Zoning Overlay District permits businesses on M and R2 District zoned parcels to engage in commercial business activities after receiving recommendation of approval from the City of Greensburg Historic and Architectural Review Board (HARB) and approval from the members of City of Greensburg Council. The City’s director of Planning and Development has confirmed the company’s intended medical marijuana dispensary activity will meet zoning standards and business operation criteria for that parcel – letter of support for the Greensburg Dispensary is provided in Attachment D.

The City of Greensburg has three boards which will review the company’s Greensburg Dispensary development plan.

- The HARB, a recommending board, consisting of seven members reviews business signage and building façade design proposals to ensure consistency with the City of Greensburg Guidelines for Building Facades and Business Signs.
- The Planning Commission, an approving board, consisting of nine members reviews landscape, parking, egress, and storm water management features of the site plan proposal.
- Greensburg City Council, comprised of the mayor and four council members, review the recommendation of the HARB and then approve or reject the proposal.

The building permitting process is handled by the City of Greensburg Planning and Development Department. The City of Greensburg follows the 2009 UCC International Building Codes as required by the State of Pennsylvania and has a Planning Director and two certified Inspectors on staff. Plan reviews and specialized inspections are conducted by Code.Sys of Pittsburgh, PA. Most work in the City requiring inspections also requires plans prepared and sealed by a registered design professional, currently registered in Pennsylvania.

The company’s site plan and building façade design will comply with the City’s land use regulations and design standards contained in the Code of Ordinances of the City of Greensburg. The company’s architect has reviewed both the Code of Ordinances and the Design Guidelines of Facades and Signs and will include the applicable regulations and standards into the site and building plans.

[Redacted]

**Recognized Need for Economic Development**

The City of Greensburg Revitalization Strategy includes seeking recognition from the PA Department of Community and Economic Development as a Keystone Community. The purpose of the City of Greensburg’s Keystone Communities District is to create a land-use plan and a zone of economic prosperity that increases private and public investment, protects the charm and character of the City’s residential neighborhoods, encourages the growth of existing businesses while attracting new
ones, and enhances the connectivity between downtown and key institutions.

Analysis of national and regional economies confirms that investment in and growths of the health care and higher education sectors have been robust over the past 20 years. The City of Greensburg and community leaders recognize the City’s unique position in having Excela Westmoreland Hospital, University of Pittsburgh at Greensburg, Seton Hill University, and Lake Erie College of Osteopathic Medicine as key institutions and economic drivers of the local economy.

The City of Greensburg and their partners believe a coordinated effort to encourage new public and private investment within a defined geographic area will ensure the long-term success of these health care and higher education institutions, but also provide opportunities for residents to live in a quality environment and for entrepreneurs to prosper.

It is the intention of the company for its Greensburg Dispensary location to further improve the economic development of the surrounding area.

Second Dispensary Location

<table>
<thead>
<tr>
<th>Facility Name: Keystone Integrated Care, LLC</th>
</tr>
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<tbody>
<tr>
<td>Address: 5200 Harrison Street</td>
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<tr>
<td>City: Pittsburgh</td>
</tr>
<tr>
<td>State: PA</td>
</tr>
<tr>
<td>Zip Code: 15201</td>
</tr>
<tr>
<td>County: Allegheny</td>
</tr>
<tr>
<td>Municipality: City of Pittsburgh</td>
</tr>
</tbody>
</table>

Please provide a description of the public access at the company’s Lawrenceville Dispensary location, including all local public transportation that is available. The company’s Lawrenceville Dispensary will be its secondary dispensary location.

Summary

This response will provide a description of the public access at the company’s Lawrenceville Dispensary location, including all local public transportation that is available. The company’s Lawrenceville Dispensary will be its secondary dispensary location.

Location – Region 5, Allegheny County

5200 Harrison Street, Pittsburgh, Pennsylvania 15201

Summary of the Site

The company’s Lawrenceville Dispensary is located 2-blocks north of Butler Street in an area primarily consisting of commercially zoned properties with neighboring businesses conducting warehouse, distribution, manufacturing, and service activities.

The company’s Lawrenceville Dispensary will meet the same municipal zoning and land use requirements as other commercial facilities located in the same zoning district §1141.49. Nearby businesses are Goodwill Industries, First Commonwealth Bank, John F. Murry Funeral Home, and a...
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UPMC park ’n ride employee parking lot.
The general characteristics of the Upper Lawrenceville neighborhood consist of an equal mix of commercially zoned properties along the Allegheny River and Butler Street with blocks south of Butler Street containing residential properties. The company’s Lawrenceville Dispensary is compliant with §1161.26(b)(1), as no schools or child-care facilities are within 1000 feet, property line to property, of the proposed dispensary location.
To encourage private investment in commercial properties and business operations, the City of Pittsburgh completed the Upper Lawrenceville Plan and the Lawrenceville Community Plan to establish programs intended to remove blight, increase real estate values, and create job opportunities within Lawrenceville.
The location of the company’s Lawrenceville Dispensary at 5200 Harrison Street, Pittsburgh was chosen to maximize patient access to medical marijuana by Allegheny County residents because of the:
Highway and road network connecting the County with the Lawrenceville neighborhood,
Port Authority of Allegheny County fixed route bus system and assisted transit services for seniors and disabled residents,
City’s sidewalk network and crosswalk enhancements, and
City’s bike network that connects with seven adjacent neighborhoods.

Dispensary Description

The companies’ Lawrenceville Dispensary will be a newly constructed, two-story, 6,536 square foot building incorporating clean metal panel, light stucco and brick materials.

The front building façade is designed to face a surface 8-space parking area where patients will enter from 52nd Street. The parking lot will contain 2 ADA compliant spaces and will be free to patients with employees and tenants parking at private lots or in metered street spaces.
The building will have two separate entrances, one for patients into the dispensary and another into an elevator lobby for access to the second-floor tenant space occupied by Pennsylvania Medical Cannabis Society (PAMCS) offices and c3 Comprehensive Clinical Consultants, a research team from Western Psychiatric Hospital in Pittsburgh.
The dominant front elevation of the building will give a new and distinct presence to this end of 52nd Street giving it a visible presence and connection to Butler Street and the Lawrenceville community.

Patients will follow a comfortable circulation path from security screening into the main waiting area possessing leisure and educational reading material, a flat screen television, and WiFi internet access with a seating capacity for 13 patients.

Proceeding to the central dispensary area, patients will first seek medicine consultation with the Patient Coordinator in one of four private offices.
After the consultation, the patient will be introduced by the Patient Coordinator to the appropriate medical marijuana products at the central dispensary counter.
Patients after purchasing medicine will exit from the same door that they entered.
The loading dock is designed to be accessed from the rear corner of the building on Harrison Street.
where deliveries are secured by four separate passages into the main building, out of public sight, with a private entrance for the shipping and receiving of medical marijuana –§1161.26(f).

Sustainable features that will be incorporated into the building design include:
- Natural daylight into the dispensary area.
- White TPO rooftop materials that feature heat-welded seam integrity and heat reflecting technology.
- Metal composite wall panels with advanced thermal and moisture protection properties.
- Energy efficient furnace and appliances.
- [Redacted]
- [Redacted]

Public Access

Residents of Allegheny County may access the Lawrenceville Dispensary by using several transportation methods including private car, buses, ride-share services, AMTRAK train, bicycle, and sidewalks. A majority of Allegheny County residents will use a private car or a scheduled/dedicated public transportation service to reach the dispensary via local, state and interstate roads.

Highway Access

The City of Pittsburgh is centrally located within Allegheny County and at the intersection of two interstate highways, three US routes and nine Pennsylvania routes traversing the County. Residents can easily access the company’s Lawrenceville Dispensary because of the interconnectivity of this highway/road network and from bridge connections to PA Route 28. The highway/road network consists of:
- Interstate 376
- Interstate 279
- US Route 30
- US Route 22
- US Route 19
- PA Route 65
- PA Route 51
- PA Route 60
- PA Route 50
- PA Route 885
- PA Route 837
- PA Route 130
- PA Route 380
- PA Route 8
- PA Route 28
- [Redacted]

These routes also connect with other road networks extending across Allegheny County including
Interstate 79, Interstate 76, and PA Route 910.

Allegheny County residents traveling to the company’s Lawrenceville Dispensary will use a road network consisting of low volume municipal streets/roads that connect to higher volume US and PA Routes with some choosing nearby Interstate highways as an option.

The population of Allegheny County is 1,223,348 with total households being 529,534. Considering a drive time of 30 minutes to the company’s Lawrenceville Dispensary, a total of 853,916 residents (69.8% of the county population) or 382,733 households can reach the company’s Lawrenceville Dispensary. These residents live in 59 municipalities and 24 townships within Allegheny County. With a 20-minute drive time or less, the company’s Lawrenceville Dispensary can be reached by 378,235 residents (30.9 % of the county population) or 168,972 households.

The majority of Allegheny County residents will travel to the company’s Lawrenceville Dispensary by connecting with PA Route 28 and then crossing the Allegheny River at the 40th Street Bridge or the 62nd Street Bridge to reach Butler Street and then Harrison Street, Lawrenceville. Drawing a geographic circle with a 14-minute drive time to reach the company’s Lawrenceville Dispensary, a total of 6 intersections of significant highway/road routes are contained within this area.

[Redacted]

PA Route 8 and PA Route 28

The intersection of the PA Route 8 and PA Route 28 connects the northern municipalities and north eastern municipalities of Allegheny County with the eastern edge of Pittsburgh. These routes provide the greatest access by northern Allegheny County residents to the company’s Lawrenceville Dispensary as a 30-minute travel time extends to Richland Township, Natrona Heights Borough, and Harrison Township.

Route 8 is the third most traveled north-south corridor between the Pittsburgh and Butler County with a daily traffic count of 29,000 vehicles with 14,000 vehicles crossing the Allegheny River at the 62nd Street Bridge to reach Butler Street. PA Route 28 is the second most traveled east-west corridor with a daily traffic count of 53,000 vehicles. The two travel lanes in each direction permit residents to proceed across Allegheny County as they travel west towards Pittsburgh or northeast to Armstrong County.

Allegheny County residents living north and northeast of the company’s Lawrenceville Dispensary will travel 1.6 miles from the intersection of PA Route 8 and PA Route 28 to reach the dispensary.

[Redacted]

Interstate 279 and PA Route 28

The intersection of Interstate 279 (I-279) and PA Route 28 connects the northern municipalities and north eastern municipalities of Allegheny County with downtown Pittsburgh. I-279 is the most
traveled north-south highway and primarily serves at the main access route between Pittsburgh and its northern suburbs with a daily traffic count of 47,000 vehicles. Its southern termination is at Interstate 376/Fort Pitt Bridge in Pittsburgh and the northern termination is in Franklin Park at Interstate 79.

The intersection of I-279 with PA Route 28 (daily traffic count of 42,000 vehicles at this intersection) is the first of several roads/streets Allegheny County residents travel east to reach the Lawrenceville neighborhood. The company’s Lawrenceville Dispensary is 3.5 miles from the intersection I-279 with PA Route 28.

[Redacted]

**PA ROUTE 65, PA ROUTE 28 AND INTERSTATE 279**

The intersection of PA Route 65 and PA Route 28 at I-279 connects the north-western municipalities and north eastern municipalities of Allegheny County with downtown Pittsburgh. PA Route 65 is the second most traveled west-east corridor with a daily traffic count of 24,000 vehicles at the City’s western municipal border with traffic growing to 34,000 vehicles upon reaching the intersection of I-279 as local roads/ streets and another PA Routes merge into the route.

At the intersection of I-279, Allegheny County residents will proceed 3.5 miles east on PA Route 28 to reach the 40th Street bridge to cross the Allegheny River and reach the Lawrenceville Dispensary.

[Redacted]

**PA ROUTE 65, PA ROUTE 51 AND PA ROUTE 60**

The third most traveled west-east route to reach downtown Pittsburgh from the western municipalities of Allegheny County is at the intersection of PA Routes 51 and 60 before crossing the Ohio River on the West End Bridge to the intersection with PA Route 65. PA Route 51 is a significant route as it crosses Western Pennsylvania from the Ohio border south, passing the City of Pittsburgh, towards Uniontown, Fayette County. PA Route 51 has a daily traffic count of 15,000 vehicles from the west and 27,000 vehicles from the south east at the intersection with PA Route 60. PA Route 60 has a daily traffic count of 6,800 vehicles and crosses the western municipalities of Allegheny County.

At the intersection with PA Route 65, at total of 37,000 vehicles crosses the West End Bridge to reach the North Shore of the Ohio River. At the intersection of I-279, Allegheny County residents will proceed 3.5 miles east on PA Route 28 to reach the 40th Street bridge to cross the Allegheny River and reach the Lawrenceville Dispensary.

**INTERSTATE 376/US ROUTE 30/US ROUTE 22 AND INTERSTATE 279**

Interstate 376 (I-376) is a major route of the metropolitan Pittsburgh region connecting the PA Turnpike (I-76) at the Monroeville interchange to the east with downtown Pittsburgh at its center before proceeding west to the Pittsburgh International Airport and then north to Interstate 80 in...
Mercer County. Within Allegheny County, I-376 runs along the majority of the Parkway West and the Parkway East. The route is also shared by US Route 30 and US Route 22 crossing Allegheny County.

From the western municipalities of Allegheny County, I-376 has a daily traffic count of 70,000 vehicles before the merger of US Route 19 at the Fort Pitt Tunnel growing to 93,000 vehicles crossing the Fort Pitt Bridge to downtown Pittsburgh. US Route 19 serves the southern municipalities of Allegheny County before proceeding to the Pennsylvania border with West Virginia.

From the eastern municipalities of Allegheny County, I-376/US Route 30/US Route 22 has a daily traffic count of 84,000 vehicles upon entering the city of Pittsburgh. At the split with Interstate 579, the daily traffic count of I-376/US Route 30/US Route 22 is 77,000 vehicles proceeding west to the intersection with I-279 at the Fort Pitt Bridge with a total of 39,000 vehicles proceed on I-579 towards downtown Pittsburgh and PA Route 28.

At the intersection of I-279 or I-579, Allegheny County residents will proceed 3.5 miles east on PA Route 28 to reach the 40th Street bridge to cross the Allegheny River and reach the Lawrenceville Dispensary.

**Butler Street**

Butler Street is the main east-west corridor of the Lawrenceville neighborhood of Pittsburgh. It is on the southern shore of the Allegheny River with PA Route 28 on the northern shore. Butler Street is easily accessed from PA Route 28 at the 31st Street Bridge, the 40th Street Bridge, and the 62nd Street Bridge. An Allegheny County resident living in an eastern municipality of Verona, Oakmont, and Penn Hills can reach the Lawrenceville neighborhood by traveling west on Allegheny River Blvd that merges with PA Route 130 and then PA Route 8 and then Butler Street at the eastern border of the city of Pittsburgh. At the 62nd Street Bridge and the intersection with PA Route 8, residents continue west towards downtown Pittsburgh passing through the center of Lawrenceville before terminating at the intersection of Penn Ave and 34th Street at the edge of the Strip District neighborhood.

In the Lawrenceville neighborhood, Butler Street is one travel lane in each direction with most of the street containing parking spaces on the northern and southern side. The daily traffic count along Butler Street varies with 14,000 vehicles at the intersection with PA Route 8, 14,000 vehicles at the intersection of 52nd Street, 23,000 vehicles at the intersection of 40th Street, and 7,400 vehicles at the intersection of Penn Avenue and 34th Street. The street is used by commercial traffic, PAT buses, commuter traffic, and residents. It is a shared street with cyclists and vehicles using the same travel lanes. The company’s Lawrenceville Dispensary is located 135 feet from Butler Street.

**Public Transportation**

The company has chosen its Lawrenceville Dispensary location specifically because of its access to public transportation.

**Port Authority of Allegheny County (PAT) Bus Service**
PAT provides public transportation throughout Pittsburgh and Allegheny County for residents, workers and visitors. The PAT's 2,600 employees operate bus, light rail, incline and paratransit services for approximately 200,000 daily riders. PAT's fleet includes more than 700 buses and more than 80 light rail vehicles.

In fiscal year 2015, PAT served more than 214,000 riders on an average weekday. Total riders for 2015 totaled almost 64 million. The 2015 ridership data include:
- Weekday bus riders - 179,361
- Weekday T riders - 27,877
- Saturday ridership - 103,233
- Sunday ridership - 64,792.

The residents are able to reach the company's Lawrenceville Dispensary because PAT owns an extensive network of transit properties and facilities throughout the County. This network includes busways, park and ride surface lots and garages, and light rail system. The three busways transport residents living in the neighborhoods and municipalities located south, east and west of downtown Pittsburgh. The park and ride locations offer over 14,000 parking spaces at 54 surface lots and garages with many located along busways and T lines; their Light Rail System. The T is a 26.2-mile light rail system running from the North Shore and Downtown Pittsburgh through Pittsburgh's southern neighborhoods and South Hills suburbs.

The PAT operates three bus routes that use Butler Street. The routes are:
- Route 87 – Friendship
- Route 91 – Butler Street
- Route 93 – Hazelwood to Lawrenceville.

The company's Lawrenceville Dispensary is located 135 feet from Butler Street. Specific bus routes that reach Lawrenceville are:
- Route 64 – Waterfront to Lawrenceville
- Route 86 – Liberty Avenue
- Route 88 – Penn Avenue
- Route 54 – Northside to Oakland to Southside.

The PAT route network extending to the County border is extensive with flyer routes from Trafford, McKeesport, Monroeville, Oakmont, Bridgeville, and Moon to downtown Pittsburgh.

**ACCESS SERVICE**

PAT sponsors ACCESS; a door-to-door, advance reservation, shared-ride transportation program that primarily serves seniors and persons with disabilities throughout Allegheny County. PAT reported the average weekday ACCESS rider count at 5,411. Once registered, residents may ride for free or at a discount on ACCESS transit services to gain access to the company's Lawrenceville Dispensary.

As a coordinator of paratransit service, ACCESS offers special discount programs, as well as providing service for groups, human service agencies and other organizations that purchase transportation for their clients. ACCESS is also open to the general public at full fare rates. ACCESS provides service
seven days per week, from 6:00 A.M. to midnight.

There are more than 150 agencies that sponsor ACCESS rides for their participants and pay all or part of the fare within Allegheny County and the City of Pittsburgh. The company will maintain a list of these agencies to assist patients looking to use ACCESS to reach the company’s Lawrenceville Dispensary.

ACCESS service is provided with a combination of 300 lift-equipped vans and sedans operated by seven service providers that comply with maintenance, driver training, and accessibility standard requirements.

Allegheny County residents with a disability or 65+ years of age qualify for discounted or free transportation services. These programs include:

**ACCESS ADA Program**
The ACCESS ADA Program is a service offered for people with disabilities, regardless of age, who are functionally unable to use a traditional PAT bus service.

**ACCESS 65 Plus Program**
The ACCESS 65 Plus Program provides an 85% discount on ACCESS fares for anyone aged 65 and older with program funds provided by the Pennsylvania Lottery through the Pennsylvania Department of Transportation. Senior citizens with a Pennsylvania Senior Citizen ID Card or a Medicare card are entitled to ride for free on a fixed route bus and the T at all times.

**Connections Program**
The Connections Program is open to disabled residents who are able to ride the bus, but need a ride to or from the fixed route bus stop.

In addition to services described above for disabled residents, PAT provides the following amenities for riders with disabilities or special needs: Braille and large print schedules, TTY Customer Service, Bus identifier kits, handheld signs, and Braille vehicle number identification.

[Redacted]

**Pedestrian and Bike Networks**
For those more able-bodied residents, there is a network of pedestrian and bike paths providing access to the Lawrenceville Dispensary.

**Sidewalk Network**
The city of Pittsburgh has a well-developed sidewalk network utilized by both residents and visitors. Lawrenceville, along with the seven surrounding neighborhoods of Strip District, Bloomfield, Garfield, Millvale, Upper Lawrenceville, Stanton Heights, and Polish Hill, has a sidewalk network as part of the infrastructure for safe pedestrian movement. The company’s Lawrenceville Dispensary will be easily
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accessible by the City’s sidewalk network.

Within downtown Pittsburgh, many of the signalized intersections also possess crosswalk signals and curb cuts for motorized wheel chairs. Depending on the City’s traffic light investment schedule, the Department of Public Works Traffic Operations Division completes crosswalk signal upgrades to improve pedestrian safety and movement within targeted neighborhoods. In the eastern neighborhoods, intersections with high pedestrian and vehicle traffic possess crosswalk signals. The Lawrenceville neighborhood has crosswalk signals at key locations of the Children’s Hospital complex, 40th Street and Butler Street, 40th Street and Penn Avenue, and 45th Street and Butler Street.

To improve pedestrian safety and movement, the City is completing two types of updates at intersections.

The Public Works Department is painting crosswalk pavement markings defining the pedestrian crosswalk area at many of the signalized and non-signalized intersections. At the time of property transfer between owners, the City requires the installation of curb cuts and tactile markers at intersections to assist residents with limited visibility and motorized wheelchairs. The large number of real estate transactions occurring in the Lawrenceville neighborhood has resulted in the completion of this update at many intersections.

There are 7 intersections on Butler Street within a 1/2-mile radius of the company’s Lawrenceville Dispensary possessing traffic signals. The intersection of Butler Street & 55th Street has a crosswalk signal and a traffic light with Butler Street and 52nd Street having a traffic light and painted crosswalk.

[Redacted]

PITTSBURGH BIKE LANE NETWORK

The City of Pittsburgh has an extensive bike lane network connecting neighborhoods, institutions, regional assets and the downtown. The company’s Lawrenceville Dispensary is 135 feet from the Butler Street bike route and easily accessible by City residents using a bicycle.

The Public Works Department uses a combination of shared streets with pavement markings and dedicated bike lane, protected by delineators, for the bike network. The dedicated bike lanes are on Penn Avenue in the City’s Cultural District and Strip District. Most of the bike lane network consists of shared streets with vehicles noted by painted bike markers on the pavement to inform drivers to be alert of cyclists.

Cyclists use Butler Street, Penn Avenue, and Liberty Avenue to reach the Lawrenceville neighborhood and other parts of the City. Other streets that connect to Lawrenceville are Friendship Avenue and Millvale Avenue.

The City’s Planning Department completed a pedestrian and bike count in May 2015 that reported the intersections near the company’s Lawrenceville Dispensary has:

Liberty Ave. & Millvale Ave. (1.5 miles from the dispensary) - 130 pedestrians & 32 cyclists.
38th Street & Butler Ave. (1 mile from the dispensary)- 119 pedestrians & 24 cyclists
Smallman St. & 21st St. (2.5 miles from the dispensary) - 154 pedestrians & 33 cyclists.
18th Street & Penn Ave. (2.6 miles from the dispensary) - 205 pedestrians & 37 cyclists.

[Redacted]

**RIVERFRONT TRAIL NETWORK**

The Three Rivers Heritage Trail (TRHT) is a 24-mile nonlinear multi-use riverfront trail system along both banks of the three rivers with access to city neighborhoods, business districts, and local attractions. The TRHT is popular for recreation and provides a safe route for commuters and serves as the hub for other trails such as the Great Allegheny Passage.

The TRHT extends east along the southern and northern bank of the Allegheny River and stops 1.2 miles from the company’s Lawrenceville Dispensary at the intersection with 43rd Street. From the northern bank, residents cross at the 40th Street Bridge and proceeding east on Butler Street to 52nd Street to reach the company’s Lawrenceville Dispensary. Residents from the Southside or Downtown neighborhoods will proceed on the Trail along the southern bank of the Allegheny River to 24th street in the Strip District and then proceed on Penn Avenue to Butler Street to 52nd Street in Lawrenceville.

Reported in the user survey and economic impact report completed by the Friends of the Riverfront, the Trail was used by 822,873 visitors in 2014 with 44.1% biking, 32.7% walking, 20.8% running, and 2.4% rollerblading.

**Train Service**

**AMTRAK provides daily east and west bound passenger rail service** to and from the city of Pittsburgh (AMTRAK–Pittsburgh, PA (PGH)). The AMTRAK Pittsburgh Train Station is located at 1100 Liberty Avenue, Pittsburgh and two-blocks from the Greyhound bus terminal on 11th Street, Pittsburgh approximately 3.5 miles from the dispensary. AMTRAK ridership boarding at the Pittsburgh Train Station was reported at 129,400 passengers on the Pennsylvanian or Capitol Limited trains in 2012.

The Pennsylvanian travels daily between New York City and Pittsburgh with the east bound departure at 7:30 AM and the west bound stop at 8:05 PM Monday thru Sunday. The Pennsylvania stops at the neighboring Western Pennsylvania communities of Greensburg, Latrobe, Johnstown, and Altoona. The Pennsylvanian train connects in Pittsburgh with Capitol Limited trains 29 and 30 that run between Chicago and Washington D.C.

The Capitol Limited train runs daily between Washington, DC and Pittsburgh with a stop at the neighboring Western Pennsylvania community of Connellsville, Fayette County.

The PAT bus routes 86 Liberty, 87 Friendship, 88 Penn, and 91 Butler Street have stops in the Strip District and downtown Pittsburgh accessible by AMTRAK passengers which can be used to access the company’s Lawrenceville Dispensary. AMTRAK passengers can also use UBER/Lyft and several taxi
service companies to access the company’s Lawrenceville Dispensary.

**Uber / Taxi Service**

The ever-growing popularity of on-demand private car services has forced several taxi service companies to improve transportation service to Allegheny County and City of Pittsburgh residents that can’t or don’t drive and choose not to use public transportation services.

**Taxi Service:** Allegheny County and City of Pittsburgh residents have access to several taxi service companies including Pittsburgh Transportation Group, Yellow Cab of Pittsburgh, OnCabs of Pittsburgh, and QuickCab to name a few. In addition, residents can use several ride-booking apps like Z-Trip of Pittsburgh, FlitWays, and CabbyGoto to schedule transportation service to the company’s Lawrenceville Dispensary.

**UBER & Lyft:** In August 2014, UBER and Lyft established service in Allegheny County and City of Pittsburgh after receiving approval by the Pennsylvania Public Utility Commission. UBER and Lyft are an on-demand private car service individuals confirm by using a location based app installed on their phone. It is an alternative transportation option available to Allegheny County and City of Pittsburgh residents to augment the public transportation system of local and commuter buses. Residents use UBER and Lyft to fill a gap left when taxi service providers started to restrict hours and days of operation within the City and County to reach company’s Lawrenceville Dispensary.

**Site Description**

The company’s Lawrenceville Dispensary is located 2-blocks north of Butler Street in an area primarily consisting of commercially zoned properties with neighboring businesses conducting warehouse, distribution, manufacturing, and service activities.

The existing building is currently used as warehouse space and in poor condition and will be removed from the site for the newly constructed, two-story, building and patient parking lot. New sidewalks will be installed on the site connecting the company’s Lawrenceville Dispensary to the existing sidewalk network and Butler Street PAT bus routes for improved accessibility by patients. The company’s Lawrenceville Dispensary will meet the same municipal zoning and land use requirements as other commercial facilities located in the same zoning district §1141.49. Nearby businesses are Goodwill Industries, First Commonwealth Bank, John F. Murry Funeral Home, and a UPMC park ‘n ride employee parking lot.

The general characteristics of the Upper Lawrenceville neighborhood consist of an equal mix of commercially zoned properties along the Allegheny River and Butler Street with blocks south of Butler Street containing residential properties.

The company’s Lawrenceville Dispensary is compliant with §1161.26(b)(1), as no schools or child-care facilities are within 1000 feet, property line to property, of the proposed dispensary location. The company’s Lawrenceville Dispensary is located on the western edge of the and 100’ from the eastern edge of the . These two US Census Tracts cover the Upper Lawrenceville and Middle Lawrenceville areas of the neighborhood.
**Zoning Regulations & Building Permitting**

The company’s Lawrenceville Dispensary is located within the City of Pittsburgh Urban Industrial Zoning District (UI) and immediately adjacent to the Local Neighborhood Commercial Zone District (LNC). The UI district in the Lawrenceville neighborhood is positioned parallel to the Allegheny River and is intended to:

- Allow mid-sized to large industries with lower external impacts on surrounding properties and districts.
- Provide a flexible district that addresses the growing need for easily adaptable and flexible spaces, including office parks, incubator spaces, high technology and service sector industries.
- Allow multi-use buildings that permit assembly, inventory, sales, and business functions within the same space.
- Encourage adaptive reuse of manufacturing buildings and allow the development of high density multi-unit residential buildings.

The LNC district in the Lawrenceville neighborhood contains the properties to the north and south of the Butler Street corridor and is intended to:

- Provide a development opportunity for small office uses in districts that are primarily residential in use, but are not otherwise attractive for additional residential investment.
- Provide a development opportunity for small offices in close proximity to residential areas.
- Provide viable uses for property on traffic arterials which are otherwise not desirable for residential development and which extend through neighborhoods.
- Provide suitable controls to address the impacts of non-residential development on residential neighborhoods.

The company’s Lawrenceville Dispensary will follow the City’s Site Plan Review and approval in accordance with the Site Plan Review procedures of City Code Section 922.04:

- Any new construction, building addition or enlargement or exterior renovation of an existing structure on a lot that has an area of eight thousand (8,000) square feet or more.
- Any off-street parking area that includes more than ten (10) parking spaces or more than 2500 square feet of surface area.

The City of Pittsburgh Department of City Planning is responsible for reviewing the company’s Lawrenceville Dispensary Site Plan in the UI district as outlined in the Site Plan Review Criteria of Section 922.04.E. A complete application for site plan approval will be submitted to the Zoning Administrator in a required form along with a nonrefundable fee to process the development application. If determined necessary by the Zoning Administrator, the Lawrenceville Dispensary Site Plan will be reviewed by the City’s Planning Commission.

The Zoning Administrator confirmed the company’s intended medical marijuana dispensary activity will meet zoning standards and business operation criteria for that parcel – letter of support for the Cranberry Dispensary is provided in Attachment D.

**Recognized Need for Economic Development**

The City of Pittsburgh, The Lawrenceville Corporation, Lawrenceville United and other entities and residents have focused talent and resources to transition the neighborhood from an economically...
distressed community with low property values, blight, crime, and a declining population to a nationally recognized neighborhood success story with many strengths. The Lawrenceville Community Plan defines the Butler Street Business District as supportive of the resurgence of Lawrenceville’s residential neighborhood by:

Providing job opportunities,
Increasing property values, and
Expanding access to products and services.
The plan also address neighborhood challenges of:

Converting underutilized or nuisance properties into positive development,
Attracting new investment and desired businesses to butler street, and
Maintaining the balance between neighborhood serving businesses and regional destination businesses.
The Lawrenceville Community Plan defines the Riverfront District properties located along the Allegheny River as an area needing private investment and improved access. While nearly all of this property is zoned both UI and General Industrial (GI) and some property remains in active use by local firms, but much of this property is underutilized. Goodwill of SWPA constructed their Workforce Development Center (WFD) in 2010; a facility that provides programs and services while also creating an access point to the Allegheny River is one of these new development projects in Upper Lawrenceville neighborhood. Recent public investment by the Urban Redevelopment Authority and the Regional Industrial Development Corporation includes acquisition of substantial riverfront properties, adjacent to Carnegie Mellon University’s Robotics Consortium, as potential developments related to the robotics industry. The community desires to make this Riverfront District an integral part of the neighborhood, developing new access points and re-purposing underutilized properties into a higher and better use.

The company’s Lawrenceville Dispensary will be located within the Riverfront District, 130 feet from the Butler Street corridor and adjacent to several new commercial development projects creating job opportunities, providing products and services along with improving access to the Allegheny River and the connectivity of the neighborhood.

Third Dispensary Location

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

This response will provide a description of the public access at the company’s Cranberry Dispensary location, including all local public transportation that is available. The company’s Cranberry Dispensary will be its tertiary dispensary location.

Location – Region 5, Butler County

21181 Route 19, Cranberry Township, Pennsylvania 16033

Summary of the Site

The company’s Cranberry Dispensary is located on the northern edge of Cranberry Township along the US Route 19 commercial corridor with the property zoned planned industrial/commercial.

The Township has adopted a community character development corridor overlay district and streetscape enhancement overlay district to further extend municipal zoning and land use requirements that will be met by the company’s Cranberry Dispensary development §1141.49. The general neighborhood consists primarily of commercially zoned properties with some residential properties for planned and multifamily development set away from the US Route 19 corridor and is compliant with §1161.26(b)(1), as no schools or child-care facilities are within 1000 feet, property line to property, of the proposed dispensary location.

To encourage private investment in commercial properties and business operations, Cranberry Township approved zoning and land use requirements for several large geographic areas adjacent to the US Route 19 corridor for a business park and light industrial development. These regulations are intended to improve underutilized properties, increase real estate values, and create job opportunities within Cranberry Township.

The location of the company’s Cranberry Dispensary at 21181 US route 19, Cranberry Township was chosen to maximize patient access to medical marijuana by Butler County residents because of the: Highway and road network connecting Butler County with the Cranberry Township, Butler Area Rural Transit shared ride transit services for seniors and disabled residents, and Concentration of residents in the southwestern corner of Butler County.

[Redacted]

Dispensary Description

The company’s Cranberry Dispensary will be a newly constructed, single-story, 6,180 square foot building incorporating clean metal panel, light stucco and brick materials.

The front building façade is designed to face a surface parking area where patients will enter from a dedicated, 39-space, surface parking lot. The parking lot will be free for patients and employees with 3 ADA spaces.
There will be two separate entrances, one for patients into the 3,512-square foot dispensary and a separate entrance will be used to for a future, 2,668 square foot medical office tenant. The building will sit back 25 feet from US Route 19. Sidewalks will be installed along the entire frontage of the property to comply with Cranberry’s new Streetscape Enhancement Overlay District. Currently the site consists of ungraded, raw land with challenging topographic variations.

[Redacted]

[Redacted]

[Redacted]

As with the company’s other proposed locations in Greensburg and Lawrenceville, **patients will follow a circulation path from security screening into the main waiting area** possessing leisure and educational reading material, a flat screen television, and WiFi internet access with a seating capacity for 11 patients. If the number of patients exceeds the capacity of the wait area, they will be seated in the security vestibule until a seat becomes available in the waiting area.

From the waiting area:
Patients will enter the central dispensary counter area where they can first seek medicine consultation with the Patient Coordinator in any one of four private consulting offices. After the consultation, the patient then will be introduced by the Patient Coordinator to the appropriate medical marijuana products at the central dispensary counter.
Patients, after purchasing medicine, will exit from the same door that they entered.

[Redacted]

The loading dock is designed to be accessed at the right corner of the building’s entrance façade where deliveries are secured by four separate passages into the main building, out of public sight, with a private entrance for the shipping and receiving of medical marijuana – §1161.26(f).

Sustainable features incorporated into the building design include:
- Natural daylight into the dispensary area and along the southern facing exposure.
- White top rooftop materials that feature heat-welded seam integrity and heat reflecting technology.
- Metal composite wall panels with advanced thermal and moisture protection properties.
- Energy efficient furnace and appliances.
## Public Access

A majority of Butler County residents will use a private car or a scheduled/dedicated public transportation service to reach the company’s Cranberry Dispensary via local, state and interstate roads.

Given the geographic location of the company’s Cranberry Dispensary in the southwestern corner of Butler County, the extensive highway and route network extending beyond the municipal borders of the county, and its proximity to the adjacent counties of Allegheny, Beaver and Lawrence, the Cranberry Dispensary will also effectively serve patients residing outside Butler County.

## Highway Access

Butler County residents traveling to the Cranberry Dispensary have access to a road network consisting of low volume municipal streets/roads that connect to higher volume US and PA Routes as well as nearby Interstate highways. The population of Butler County is 183,862 with total households being 74,476. Cranberry Township is located in the south-western corner of Butler County and along **US Route 19** and adjacent to **Interstate 79**, both north–south corridors, and **Interstate 76** that crosses the Commonwealth of Pennsylvania. The residents of Butler County will reach the Cranberry Dispensary by selecting the nearest US Route or PA Route connecting with US Route 19 or I-79. These routes have intersection with one US Route and six Pennsylvania Routes traversing the County:

- **US Route 422**
- **PA Route 228**
- **PA Route 68**
- **PA Route 528**
- **PA Route 108**
- **PA Route 488**

[Redacted]

These routes also connect with other road networks extending across Butler County including:

- **US Route 8**
- **PA Route 38**
- **PA Route 308**
- **PA Route 138**.

Considering a drive time of 30 minutes from a patient’s home to the company’s Cranberry Dispensary, a total of 399,573 Butler, Allegheny, Beaver, and Lawrence County residents (23% of the four-county population and 17% of the Metropolitan Pittsburgh Area population) or 167,352 households can reach the company’s Cranberry Dispensary location. With a 20-minute drive time, the company’s
Cranberry Dispensary can be reached by 109,702 residents or 42,551 households.

[Redacted]

Focusing attention on the company’s Cranberry Dispensary serving residents of Butler County, a total of 140,490 residents (76.4% of Butler County Population) will be able to reach the Cranberry Dispensary within a 30-minute drive time.

**US ROUTE 19**

US Route 19 is a second most traveled north-south corridor stretching 20 miles across the western portion of Butler County and serving as the main access road to the company’s Cranberry Dispensary. The US Route 19 Corridor is a belt of growth in Butler County. From north to south, the communities along the corridor transition from rural to suburban characteristics while passing through small towns. Entering from Lawrence County, the daily traffic count on US Route 19 is 5,400 vehicles while reaching 17,000 at Zelienople Borough to the south and then 24,000 at Cranberry Township finally reaching 41,000 vehicles at the Allegheny County border.

According to the 2010 U.S. Census, these municipalities along the US Route 19 corridor had a population of 45,747, representing 24.9% of the total population in Butler County. US Route 19 extends through the communities of Muddy Creek Township, Portersville Borough, Lancaster Township, Zelienople Borough, Jackson Township, and Cranberry Township. The corridor also provides access to a number of nearby communities including the Worth Township, Harmony Borough, Evans City Borough, Callery Borough, Adams Township, Forward Township, Connoquenessing Township, and Franklin Township.

All Butler County residents will have to access US Route 19 to reach the company’s Cranberry Dispensary location. Traveling the length of US Route 19 from the northern border with Lawrence County to the company’s Cranberry Dispensary, the drive time is 26 minutes. The company’s Cranberry Dispensary is located on US Route 19 between the intersections with PA Route 528, 1.3 miles north of the dispensary site, and PA Route 228, 3.6 miles south of the dispensary site.

**INTERSTATE 79**

Interstate 79 (I-79) is the most traveled north-south corridor stretching 20 miles across the western portion of Butler County and one of three north-south routes passing through the Butler County with the others being PA Route 19 and PA Route 8 before exiting into Allegheny County, Lawrence County, and Venango County. I-79 is a limited access highway with a posted speed limit of 70 mph.

Entering from Lawrence County, the daily traffic count on I-79 is 26,000 vehicles while reaching 38,000 at Zelienople Borough to the south and then 46,000 at Cranberry Township finally reaching
According to the 2010 U.S. Census, these municipalities along the I-79 corridor had a population of 60,084, representing 32.7% of the total population in Butler County. Traveling the length of I-79 from the northern border with Lawrence County to the company’s Cranberry Dispensary, the drive time is 24 minutes. I-79 extends through the communities of Worth Township, Muddy Creek Township, Lancaster Township, Zelienople Borough, Harmony Borough, Jackson Township, and Cranberry Township. The corridor also provides access to a number of nearby communities including Portersville Borough, Evans City Borough, Callery Borough, Adams Township, Forward Township, Connoquenessing Township, Franklin Township, Brady Township, West Liberty, Slippery Rock Township, and Slippery Rock Borough.

Butler County residents can exit Interstate 79 at two locations with a connecting route to US Route 19 to reach the company’s Cranberry Dispensary. The northern I-79 exit is onto US Route 19 south of Zelienople Borough and 2.7 miles from the Cranberry Dispensary. The southern I-79 exit is onto PA Route 228 which connects to US Route 19 and is 3.6 miles from the Cranberry Dispensary.

[Redacted]

**PA ROUTE 228**

PA Route 228 is a **significant east-west 21-mile corridor** passing through the southern portion of Butler County ending at Cranberry Township. Starting at the intersection with PA Route 356, PA Route 228 has a daily traffic count of 5,300 vehicles and increasing in volume as the route proceeds west crossing US Route 8 with 17,000 vehicles proceeding towards Cranberry’s eastern municipal border reaching a daily traffic count of 22,000 vehicles before ending at US Route 19 with 36,000 vehicles. The route also carries a large volume of northern Allegheny County traffic to the numerous businesses along the road.

According to the 2010 U.S. Census, these municipalities along the PA Route 228 corridor had a population of 75,523, representing 41.1% of the total population in Butler County. PA Route 228 extends through the communities of Buffalo Township, Clinton Township, Middlesex Township, Mars Borough, Adams Township, Seven Fields Borough, and Cranberry Township. The corridor also provides access to a number of nearby communities including Winfield Township, Saxonburg Borough, Jefferson Township, Penn Township, and Callery Borough.

Butler County residents living in the southern portions of the county will reach the company’s Cranberry Dispensary by proceeding west on PA Route 228 and connecting with US Route 19 and heading north to the dispensary. Traveling from the eastern border with Armstrong County to the company’s Cranberry Dispensary, the drive time is 52 minutes. Approaching the company’s Cranberry Dispensary on US Route 19 from the PA Route 228 intersection is a distance of 3.6 miles.
PA ROUTE 528
PA Route 528 is a 22-mile road, through rural areas and connecting small towns and highways, starting at US Route 19 and ending at US Route 8 in the northern part of Butler County. For most of PA Route 528, the daily traffic count is 1,500 vehicles before growing to 10,000 vehicles at the intersection of PA Route 68 west of Evans City and proceeding west to the intersection of US Route 19.

According to the 2010 U.S. Census, these municipalities along the PA Route 528 corridor had a population of 32,116, representing 17.5% of the total population in Butler County. PA Route 528 extends through the communities of Brady Township, Franklin Township, Prospect Borough, Connoquenessing Township, Forward Township, Evans City Borough, and Jackson Township. The corridor also provides access to a number of nearby communities including Slippery Rock Township, Cherry Township, and Clay Township.

Butler County residents living in the central and northwestern portion of the county will reach the company’s Cranberry Dispensary by proceeding south and connecting to US Route 19 intersection and then south to the dispensary. The company’s Cranberry Dispensary is 1.3 miles from the intersection of US Route 19 and PA Route 528.

US ROUTE 8
US Route 8 is the third most traveled north-south corridor passing for 35 miles through the center of Butler County. The US Route 8 Corridor is a belt of commercial properties and small towns in Butler County. From north to south, the communities with access to the corridor transition from rural to urban at the City of Butler to suburban characteristics at Allegheny County. Entering from Venango County, the daily traffic count on US Route 8 is 4,000 vehicles while reaching 15,000 at the City of Butler to the south and then 30,000 at the intersection with PA Route 228 and finally reaching 17,000 vehicles at the Allegheny County border.

According to the 2010 U.S. Census, these municipalities along the US Route 8 corridor had a population of 59,374, representing 32.3% of the total population in Butler County.

US Route 8 extends through the communities of Mercer Township, Harrisville Borough, Slippery Rock Township, Brady Township, Clay Township, Center Township, Butler Township, City of Butler, Penn Township, and Middlesex Township. The corridor also provides access to a number of nearby communities including the Marion Township, Slippery Rock Borough, East Butler Borough, and Summit Township. The Butler Transit Authority utilizes US Route 8 for many of its bus routes.

Butler County residents living in the central and northern portions of the county will reach the company’s Cranberry Dispensary by connecting to either PA Route 68 to the intersection of PA Route 528 west of Evans City and proceeding to the US Route 19 intersection and then traveling 1.3 miles.
south to the dispensary or connecting with PA Route 228 to the intersection of US Route 19 and then traveling 3.6 miles north to the dispensary.

**PA ROUTE 68**

PA Route 68 is a **90 mile east–west state highway** located in western Pennsylvania that runs southwest-northeast across Beaver, Butler, Armstrong, and Clarion counties. The western terminus of the route is at the Ohio state line in Beaver County and the eastern terminus at US Route 322 in Clarion, PA. Entering from Armstrong County and passing through Chicora Borough, the daily traffic count on PA Route 68 is 5,300 vehicles while reaching 8,500 at the City of Butler to the south and then 16,000 at the intersection with PA Route 528 west of Evans City Borough and finally reaching 4,200 vehicles at the Beaver County border.

According to the 2010 U.S. Census, these municipalities along the PA Route 68 corridor had a population of 53,822, representing 29.2% of the total population in Butler County. PA Route 68 extends through the communities of Fairview Township, Chirora Borough, Donegal Township, Oakland Township, Summit Township, Forward Township, Butler Township, City of Butler, Connoquenessing Township, Connoquenessing Borough, Evans City Borough, Harmony Borough, Zelienople Borough, and Jackson Township. The corridor also provides access to a number of nearby communities including the Center Township, Karns City Borough, East Butler Borough, and Franklin Township. The Butler Transit Authority utilizes PA Route 68 for many of its bus routes.

Butler County residents living in the central and northeastern corner of the county will reach the company’s Cranberry Dispensary by connecting to PA Route 528 west of Evans City and proceeding to the US Route 19 intersection and then south to the dispensary. Traveling from the Butler County Courthouse on PA Route 68 to the company’s Cranberry Dispensary, the drive time is 28 minutes. The company’s Cranberry Dispensary is 1.3 miles from the intersection of US Route 19 and PA Route 528.

**US ROUTE 422**

US Route 422 is a **primary east-west corridor stretching 26 miles** across the middle portion of Butler County entering Pennsylvania near the City of New Castle and proceeds east through the counties of Lawrence, Butler, Armstrong, Indiana, and Cambria County. Major cities along the route include New Castle, Butler, Kittanning, and Indiana. The US Route 422 corridor is lined with a combination of commercial businesses and rural farm land in Butler County.

According to the 2010 U.S. Census, these municipalities along the US Route 422 corridor had a population of 55,429 representing 30.1% of the Butler County’s population. Entering from Lawrence County and intersecting with US Route 19 and I-79, the daily traffic count on US Route 422 is 12,000 vehicles while reaching 20,000 at the City of Butler to the north and then 11,000 at the Armstrong County border.

US Route 422 extends through the communities of Clearfield Township, Summit Township, City of Butler, Butler Township, Franklin Township, Prospect Borough, and Muddy Creek Township. The
The corridor also provides access to a number of nearby communities including the Worth Township, Center Township, Oakland Township, and Donegal Township. Butler County residents living in the central portion of the county will reach the company’s Cranberry Dispensary Cranberry by connecting to PA Route 528, PA Route 68 and US Route 8 and proceeding to the US Route 19 intersection and then to the dispensary with the respective driving distances being 17 miles, 30 miles and 22 miles.

**PA Route 38 and PA Route 308**

PA Route 38 and PA Route 308 are north-south routes connecting the northern part of Butler County and the communities of West Sunbury, Eau Claire and Cherry Valley to the City of Butler. Route 308 is a 28-mile state highway with PA Route 38 a 40-mile state highway that ends at the City of Butler. Both routes start in Venango County and proceed south through Butler County passing mainly through rural and farmland before reaching the suburban community of Butler Township and the City of Butler.

According to the 2010 U.S. Census, these municipalities along the PA Route 38 and PA Route 308 corridor had a population of 36,446, representing 19.8% of the total population in Butler County. Entering from Venango County and passing south, the daily traffic count on PA Route 38 and PA Route 308 transitions from 1,500 vehicles to 4,000 vehicles upon reaching the City of Butler as numerous population centers and municipal roads connect with each route.

PA Route 38 and PA Route 308 extend through the communities of Marion Township, Venango Township, Allegheny Township, Cherry Valley Borough, Eau Claire Borough, Washington Township, Cherry Township, West Sunbury Borough, Concord Township, Oakland Township, Center Township, and City of Butler. The corridor also provides access to a number of nearby communities including the Parker Township, Bruin Borough, and Fairview Township. Butler County residents living in the northern portion of the county will reach the company’s Cranberry Dispensary by connecting to PA Route 68 in the City of Butler and then traveling south to PA Route 528 and proceeding to the US Route 19 intersection and then to the location will travel approx. 40 miles.

**Public Transportation**

The company has chosen its Cranberry Dispensary location specifically because of its access to a shared ride public transportation system available to seniors and disabled residents of Butler County.

**Butler Transit Authority (BTA)**

BTA has provided public transportation services for residents of the City of Butler and Butler Township. Butler Transit currently owns and oversees the operation of a fleet of 8 buses ranging from small 28 passenger buses to 45-foot deluxe road coaches. The BTA has developed 5 bus routes providing transportation for residents to reach destination points both within City of Butler and Butler Township. BTA provides free rides for individuals over the age of 65 seven days a week possessing a Senior Pass card. Once registered, residents may ride for free on fixed-route BTA public bus services to gain access to the company’s Cranberry Dispensary.
**Butler Area Rural Transit (BART)**
The BART is a shared ride system transporting individuals over the age of 60 to senior centers, medical appointments, adult day care, and other destinations within Butler County using handicaps accessible vehicles. The service is available Monday through Friday from 7am to 5pm. This service allows disabled residents with a way to access the Cranberry Dispensary.

**Additional Transportation Services**
Butler County seniors and disabled residents have access to additional transportation services provided by non-profit organizations and private companies.

- AIRE RIDE, a private shared ride shuttle, provides transportation for seniors over the age of 60 living in the City of Butler, South Butler or Cranberry Township.
- The Butler Area Agency on Aging utilizes volunteer drivers to transport seniors over the age of 60 to medical appointments through the Medical Transportation Service.
- The Butler Blind Association may provide transportation for a certified client of the agency with vision deficiencies, allowing visually impaired residents without a means of transportation.
- The Butler Assist Coach is a division of Butler Ambulance Service and provides wheelchair van transportation to medical appointment when necessary.

Each of these service providers is another option for seniors and disabled residents to access the Cranberry Dispensary.

**Pedestrian and Bike Networks**

**Sidewalk Network:** The Cranberry Township municipal plan requires new residential and commercial development proposals to include the installation of sidewalks adjacent to the street or road. As development projects are completed, the sidewalk network will be linked and expanded thorough Cranberry Township providing residents with an alternative means of movement to their destination.

When the development includes an intersection, the property owner is required to install curb cuts and tactile markers to indicate the start of the crosswalk. If the intersection is a PennDOT road with a signalized traffic light, the property owner is required to install crosswalk signals. Curb cuts and tactile markers are also required when a property owner is replacing/repairing an existing sidewalk. The intent is to improve pedestrian movement within the municipality. The company will ensure to build ample sidewalk access, including handicap accessible entry ways, to its Cranberry Dispensary location.

**Bike Network:** Cranberry Township doesn’t possess a bike lane network. It is important to note that many of the neighborhood streets and roads crossing Cranberry Township are suitable for and used by more experienced cyclists. These individuals can access the Cranberry Dispensary through the network of extensive roadways (listed above).

**Uber / Taxi Service**
**Taxi Service:** Cranberry Taxi is an on-demand taxi service providing coverage to City of Butler, Butler Township, Connoquenessing, Cranberry Township, Evans City, Harmony, Mars, Valencia, and Zelienople. Reservations are not necessary but call in advance before pickup.

Butler County residents have access to several private limousine service companies which can provide scheduled transportation service to the Cranberry Dispensary. While not indicated as a service area, residents may have access to several ride-booking apps like Z-Trip of Pittsburgh, FlitWays, and CabbyGo to schedule transportation service to their destination.

**UBER & Lyft:** In August 2014, UBER and Lyft established service in Allegheny County and City of Pittsburgh after receiving approval by the Pennsylvania Public Utility Commission. UBER and Lyft are an on-demand private car service individuals confirm by using a location based app installed on their phone. It is an alternative transportation option available to Allegheny County and Butler County residents to augment the public transportation system of local and commuter buses. Residents use UBER and Lyft to fill a gap left when taxi service providers started to restrict hours and days of operation within the County.

**Site Description**

The company’s Cranberry Dispensary is positioned at the northern edge of **DOH REDACTED** and 1/2 mile from the southern edge of **DOH REDACTED** with **DOH REDACTED** being the population center east of US Route 19. The general characteristic of **DOH REDACTED** is the Township’s north-south commercial corridor and neighborhoods of multifamily housing and planned housing. The commercial corridor contains the Butler YMCA, regional car dealerships, non-denominational churches, national and local retain stores and restaurants in both large and small shopping developments. The primary highway and road network traversing the Township include U.S. Routes of 19, PA Routes 228, I-79 and I-76 serving Butler County residents and neighboring Counties.

The company’s Cranberry Dispensary is located on the primary north-south U.S. Route 19 and I-79 corridor leading into downtown Pittsburgh to the south and to Erie, PA to the north. Residents living in the northern, northeastern and eastern municipalities of Butler County can access the Cranberry Dispensary from several PA Routes and US Routes that connect with US Route 19 and I-79.

Other Cranberry Township zoning districts near the site and adjacent to the Community Character Development Corridor Overlay District are Business Park Zone (BPK), Industrial Light (I-L), R-3 Multifamily Residential, and Planned Residential Development (PRD).

The company’s Cranberry Dispensary will be constructed on vacant property along US Route 19 currently covered by small trees and bushes. The addition of the building and supporting surface parking lot will be an improvement to the property and the streetscape along US Route 19. Cranberry Township, Butler County, and Seneca Valley School District will reassess the value of the land and the
improvements to determine the new real estate tax burden collected by each taxing body.

[Redacted]

Zoning Regulations & Building Permitting

The company’s Cranberry Dispensary proposed location is zoned by Cranberry Township as Planned Industrial/Commercial (PIC) with two overlay zoning districts of Community Character Development Corridor (CCD) and Streetscape Enhancement Overlay District (SEO). The Township’s CCD Corridor Zoning Overlay District directs development to be consistent with the goal of increased flexibility of land use regulations and in conformance with the CCD Overlay Districts regulations.

The company’s site plan and building façade design will comply with the township’s land use regulations and streetscape design standards contained in the Code of Ordinances of the Township of Cranberry (eCode360®). The company’s civil engineering firm and architect have reviewed both the Code of Ordinances and the General Manual of Written and Graphic Design Guidelines and will include the applicable regulations and standards into the site and building plans.

The intent of the CCD Corridor District is to:

- Comply with Article VII-A, Traditional Neighborhood Development, of the Pennsylvania Municipalities Planning Code (MPC), Act 247, as amended, in particular, those purposes and objectives listed in Section 701-A of Article VII-A[1] such as: encouraging innovation for mixed-use pedestrian-oriented development; encouraging a more efficient use of land; establishing public space; minimizing traffic congestion; and fostering a sense of place and community. 53 P.S. § 10701-A et seq.
- Comply with the General Manual of Written and Graphic Design Guidelines which is an on-line version at the Code of Ordinances of the Township of Cranberry (eCode360®) and also on file in the Township offices.
- Implement the Comprehensive Plan for Cranberry Township.
- Emulate other successful neighborhoods possessing desired features such as attractive streetscapes, parks, centrally located public squares, plazas, civic and public buildings, civic art, recreational facilities, and other features as described and illustrated in the General Manual of Written and Graphic Design Guidelines.

The Township’s SEO Zoning Overlay District directs development to be consistent with the goal of increased flexibility of land use regulations and in conformance with the SEO Overlay Districts regulations. The purpose of the SEO District is to:

- Regulate uses and structures at, along and near major thoroughfares, transportation arteries and their intersections, in accordance with Section 605 of the Pennsylvania Municipalities...
Planning Code. See 53 P.S. § 10605.

- Implement the Comprehensive Plan for Cranberry Township.
- Implement the site and building requirements contained within the General Manual of Written and Graphic Design Guidelines, Streetscape Enhancement Overlay District.
- Provide an overall cohesive character for the streetscapes.
- Promote pedestrian circulation, pedestrian-oriented streetscapes, and bicycling.
- Enhance the streetscapes with effective and unified street walls and street edges.
- Enhance the character of the streetscapes with effective and unified street trees and other landscaping, streetlighting, hardscapes, street furniture, accessory structures, and signage.
- Enhance off-street parking lots.

The Township’s zoning officer confirmed the company’s intended medical marijuana dispensary activity will meet zoning standards and business operation criteria for that parcel—letter of support for the Cranberry Dispensary is provided in Attachment D.

Cranberry Township Planning Advisory Commission is a public board that will review the company’s Cranberry Dispensary development plan. The Commission suggests modifications where needed, advises the Supervisors on development matters under the Township Zoning and Subdivision Ordinances and Comprehensive Plan, and recommends appropriate actions. The Commission consists of five township residents that serve a four-year term as a member.

The building permitting process is handled by the Cranberry Township Department of Planning and Development responsible for facilitating and managing sustainable development that meets the needs of individual property owners and the Township as a whole within the parameters of the comprehensive plan. The Department strives to enhance the physical environment and improve the quality of life for all residents, commercial enterprises, and visitors.

**Recognized Need for Economic Development**

Cranberry Township development strategy is to create a land-use plan and zones of economic prosperity that increases private and public investment, protects the charm and character of the Township’s residential neighborhoods, encourages the growth of existing businesses while attracting new ones, and enhances the connectivity between community assets and key institutions.

Analysis of national and regional economies confirms that investment in and growth of the health care sector has been robust over the past 20 years. Cranberry Township and community leaders recognize the township’s unique geographic position in the Metropolitan Pittsburgh region and highway network has resulted in having UPMC Passavant Hospital, UPMC Lemieux Sports Medicine Center, Butler Health System Outpatient Center, VA Outpatient Clinic, and several private outpatient clinics as key institutions and economic drivers of the local economy.

Cranberry Township and their partners believe a coordinated effort to encourage new public and private investment within a defined geographic area and following adopted zoning and land use
regulations will ensure the long-term success of these businesses, but also provide opportunities for residents to live in a quality environment and for entrepreneurs to prosper.

It is the intention of the company for its Cranberry Dispensary location to further improve the economic development of the surrounding area.

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Part B – Diversity Plan

*(Scoring Method: 100 Points)*

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

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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.

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**DIVERSITY PLAN**

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

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

Diversity Plan and Policy
Understanding the Diversity Requirements

The company clearly understands the purpose of the Commonwealth in creating Diversity goals (§1141.32(a)) in accordance with section 615 of the act (35 P.S. §10231.615), which establishes the procedures for promoting and ensuring the involvement of diverse participants and diverse groups in the activities permitted by the act.

The company has taken great effort to plan and assemble a strong Diversity & Inclusion Plan and requests the Department treat this information as proprietary and confidential (§1141.32(g)).
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>
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<tbody>
<tr>
<td>First Name: [Redacted]</td>
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<tr>
<td>Occupation: Business Owner and Founder</td>
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<td>Also known as: N/A</td>
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<tr>
<td>Occupation: Board Certified Orthopaedic Surgeon</td>
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<tr>
<td>Also known as: [Redacted]</td>
</tr>
<tr>
<td>Address Line 1: DOH REDACTED</td>
</tr>
<tr>
<td>Address Line 3: [Redacted]</td>
</tr>
<tr>
<td>Phone: [Redacted]</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Name and Residential Address</th>
</tr>
</thead>
<tbody>
<tr>
<td>First Name: [Redacted]</td>
</tr>
<tr>
<td>Occupation: Business Owner and Philanthropist</td>
</tr>
<tr>
<td>Also known as: N/A</td>
</tr>
<tr>
<td>Address Line 1: [Redacted]</td>
</tr>
<tr>
<td>Address Line 3: [Redacted]</td>
</tr>
<tr>
<td>Phone: [Redacted]</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Name and Residential Address</th>
</tr>
</thead>
<tbody>
<tr>
<td>First Name: [Redacted]</td>
</tr>
<tr>
<td>Occupation: Business Owner</td>
</tr>
<tr>
<td>Also known as: [Redacted]</td>
</tr>
<tr>
<td>Address Line 1: [Redacted]</td>
</tr>
<tr>
<td>Address Line 3: [Redacted]</td>
</tr>
<tr>
<td>Phone: [Redacted]</td>
</tr>
</tbody>
</table>
## Name and Residential Address

<table>
<thead>
<tr>
<th>First Name</th>
<th>Middle Name</th>
<th>Last Name</th>
<th>Suffix</th>
<th>Occupation</th>
<th>Title in the applicant’s business</th>
</tr>
</thead>
<tbody>
<tr>
<td>[Redacted]</td>
<td>[Redacted]</td>
<td>[Redacted]</td>
<td></td>
<td>N/A</td>
<td>Financial Backer</td>
</tr>
<tr>
<td></td>
<td></td>
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<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td></td>
<td>President and Chief Financial Officer</td>
<td>Financial Backer / Director</td>
</tr>
<tr>
<td></td>
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<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td></td>
<td>Business Owner</td>
<td>Financial Backer</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

**Also known as:**

- N/A

**Address Line 1:** [Redacted]

**Address Line 2:**

<table>
<thead>
<tr>
<th>Address Line 3</th>
<th>City</th>
<th>State</th>
<th>Zip Code</th>
</tr>
</thead>
<tbody>
<tr>
<td>[Redacted]</td>
<td>[Redacted]</td>
<td>[Redacted]</td>
<td>[Redacted]</td>
</tr>
</tbody>
</table>

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

---

**Pennsylvania Department of Health**

**Medical Marijuana Dispensary Permit Application**

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If more space is required, please submit additional information on other individuals in a separate document titled “PRINCIPALS, FINANCIAL BACKERS AND OPERATORS (CONT'D)” in accordance with the attachment file name format requirements and include it with the attachments.

---

**B. Please list Employees**

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

---

<table>
<thead>
<tr>
<th>First Name</th>
<th>Middle Name</th>
<th>Last Name</th>
<th>Suffix</th>
<th>Occupation</th>
<th>Title in the applicant’s business</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

**Also known as:**

- [Redacted]

**Address Line 1:** [Redacted]

**Address Line 2:**

<table>
<thead>
<tr>
<th>Address Line 3</th>
<th>City</th>
<th>State</th>
<th>Zip Code</th>
</tr>
</thead>
<tbody>
<tr>
<td>[Redacted]</td>
<td>[Redacted]</td>
<td>[Redacted]</td>
<td>[Redacted]</td>
</tr>
</tbody>
</table>

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

---

Pennsylvania Department of Health
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</td>
<td></td>
<td></td>
</tr>
<tr>
<td>other authorization to grow, process or dispense medical marijuana in any state.</td>
<td></td>
<td></td>
</tr>
<tr>
<td>The applicant has never responded to a civil or administrative action relating to a registration,</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>
<tr>
<td>authority relating to a principal, operator, financial backer or employee of the applicant’s</td>
<td></td>
<td></td>
</tr>
<tr>
<td>profession, or occupation or fraudulent practices, including fraudulent billing practices.</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

Schedule A: Civil or Administrative History Incident

<table>
<thead>
<tr>
<th>Defendant</th>
<th>Name of Case &amp; Docket #</th>
<th>Nature of Charge or Complaint</th>
<th>Date of Charge or Complaint</th>
<th>Disposition</th>
<th>Name and Address of the Administrative Agency Involved, and the Tribunal or Court</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
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</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
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.

<table>
<thead>
<tr>
<th>Activity</th>
<th>Estimated Date</th>
</tr>
</thead>
<tbody>
<tr>
<td>Keystone Integrated Care LLC_03202017_Dispensary_Employee Qualifications, Descriptions of Duties and Training (Contd.).pdf</td>
<td>N/A</td>
</tr>
<tr>
<td></td>
<td></td>
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</tr>
</tbody>
</table>
IF MORE SPACE IS REQUIRED FOR THE OPERATIONAL TIMETABLE, PLEASE SUBMIT ADDITIONAL INFORMATION IN A SEPARATE DOCUMENT TITLED “OPERATIONAL TIMETABLE (CONTD.)” IN ACCORDANCE WITH THE ATTACHMENT FILE NAME FORMAT REQUIREMENTS AND INCLUDE IT WITH THE ATTACHMENTS.

Section 9 – Employee Qualifications, Description of Duties and Training

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

Keystone Integrated Care LLC_03202017_Dispensary_Employee Qualifications, Descriptions of Duties and Training (Contd.).pdf

1. 

2. 

3. 

4. 

5. 

6. 

7. 

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

Keystone Integrated Care LLC_03202017_Dispensary_Employee Qualifications, Descriptions of Duties and Training (Contd.).pdf

1. 

2. 

3. 

4. 

5. 

6.
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.

<p>| | |</p>
<table>
<thead>
<tr>
<th></th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td>Keystone Integrated Care LLC_03202017_Dispensary_Employee Qualifications, Descriptions of Duties and Training (Contd.).pdf</td>
<td></td>
</tr>
</tbody>
</table>

1.   
2.   
3.   
4.   
5.   
6.   
7.   

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>
</tr>
</thead>
<tbody>
<tr>
<td>A physician or a pharmacist will be present at the primary dispensary location listed in this permit application at all times during the hours the primary dispensary facility is open to dispense or to offer to dispense medical marijuana to patients and caregivers.</td>
<td>☒</td>
<td></td>
</tr>
</tbody>
</table>

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. | ☒   |    |

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.

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.
DOH REDACTED
Section 11 – Transportation of Medical Marijuana

A. Transportation

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

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

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

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

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

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

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

**B. Transport Manifest**

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

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

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

- 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
Pennsylvania Department of Health
Medical Marijuana Dispensary Permit Application

<table>
<thead>
<tr>
<th>for each harvest batch, harvest lot or process lot.</th>
<th>☐  ☒</th>
</tr>
</thead>
<tbody>
<tr>
<td>• The date and approximate time of departure.</td>
<td>☒  ☐</td>
</tr>
<tr>
<td>• The date and approximate time of arrival.</td>
<td>☒  ☐</td>
</tr>
<tr>
<td>• The transport vehicle’s make, model, and license plate number.</td>
<td>☒  ☐</td>
</tr>
<tr>
<td>• The identification number of each member of the delivery team accompanying the transport.</td>
<td>☒  ☐</td>
</tr>
<tr>
<td>• When a delivery team delivers medical marijuana to multiple medical marijuana organizations, the transport manifest must correctly reflect the specific medical marijuana in transit; each recipient will also provide the dispensary with a printed receipt for the medical marijuana received.</td>
<td>☒  ☐</td>
</tr>
<tr>
<td>• All medical marijuana being transported must be packaged in shipping containers and labeled in accordance with §§ 1151.34 and 1161.28 (relating to packaging and labeling of medical marijuana; and labels and safety inserts).</td>
<td>☒  ☐</td>
</tr>
<tr>
<td>• Separate copies of the transport manifest will be provided to each recipient receiving the medical marijuana product described in the transport manifest. To maintain confidentiality, a dispensary may prepare separate manifests for each recipient.</td>
<td>☒  ☐</td>
</tr>
<tr>
<td>• The applicant acknowledges that, upon request, a copy of the printed transport manifest, and any printed receipts for medical marijuana being transported, will be provided to the Department or its authorized agents, law enforcement, or other Federal, State, or local government officials if necessary to perform the government officials’ functions and duties.</td>
<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 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:
### Section 12 – Storage of Medical Marijuana

<table>
<thead>
<tr>
<th>A. Storage Requirements</th>
<th>Yes</th>
<th>No</th>
</tr>
</thead>
<tbody>
<tr>
<td>By checking “Yes” to any statement, you affirm that the plan of operation will address the above statements: If you check “No” to any statement, you must state the reasoning for doing so at the end of this section. If issued a permit, you must be able to affirm each statement by the time the Department determines you to be operational under the Act and regulations.</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</td>
<td>☒</td>
<td>☐</td>
</tr>
</tbody>
</table>
### B. Please describe your plans regarding the storage of medical marijuana and medical marijuana products within your facility:

<p>| | |</p>
<table>
<thead>
<tr>
<th></th>
<th></th>
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</thead>
<tbody>
<tr>
<td>of medical marijuana waste).</td>
<td></td>
</tr>
<tr>
<td>• All storage areas will be maintained in a clean and orderly condition and free from infestation by insects, rodents, birds, and pests.</td>
<td>☒ ☐</td>
</tr>
<tr>
<td>• A separate and secure area for temporary storage of medical marijuana that is awaiting disposal will be established.</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
DOH REDACTED
### Section 13 – Labeling of Medical Marijuana Products

#### A. Labeling Requirements

<table>
<thead>
<tr>
<th>Requirement</th>
<th>Yes</th>
<th>No</th>
</tr>
</thead>
<tbody>
<tr>
<td>By checking “Yes” to any statement, you affirm that the applicant will implement a quality control process to ensure that the label does not bear any of the following:</td>
<td></td>
<td></td>
</tr>
<tr>
<td>If you check “No” to any statement, you must state the reasoning for doing so at the end of this section. If issued a permit, you must be able to affirm each statement by the time the Department determines you to be operational under the Act and regulations.</td>
<td></td>
<td></td>
</tr>
<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:*

N/A

#### B. Please describe your process for creating and monitoring the labeling used for medical marijuana products:

DOH REDACTED
Pennsylvania Department of Health
Medical Marijuana Dispensary Permit Application

DOH REDACTED
### Section 14 – Inventory Management

<table>
<thead>
<tr>
<th>A. Electronic Tracking System</th>
<th>Yes</th>
<th>No</th>
</tr>
</thead>
<tbody>
<tr>
<td>You acknowledge that you must use the electronic tracking system prescribed by the Department containing the requirements in section 701 of the Act (35 P.S. § 10231.701).</td>
<td>☒</td>
<td></td>
</tr>
<tr>
<td>You acknowledge that an electronic tracking system that is approved by the Department will be deployed to log, verify and monitor the receipt of medical marijuana product from a grower/processor, the verification of the validity of an identification card presented by a patient or caregiver, the dispensing of medical marijuana product to a patient or caregiver, the disposal of medical marijuana waste and the recall of defective medical marijuana.</td>
<td>☒</td>
<td></td>
</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>
<tr>
<td><strong>Medical marijuana dispensed to a patient or caregiver.</strong></td>
<td>☒</td>
<td>☐</td>
</tr>
<tr>
<td>Damaged, defective, expired, or contaminated medical marijuana awaiting return to a grower/processor or awaiting disposal.</td>
<td>☒</td>
<td>☐</td>
</tr>
<tr>
<td>Inventory controls and procedures will be established for the conducting of monthly inventory reviews and annual comprehensive inventories of medical marijuana at the facility.</td>
<td>☒</td>
<td>☐</td>
</tr>
<tr>
<td>The written or electronic record will include the date of the inventory, a summary of the inventory findings, and the employee identification numbers and titles or positions of the individuals who conducted the inventory.</td>
<td>☒</td>
<td>☐</td>
</tr>
</tbody>
</table>

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

N/A

**C. PLEASE DESCRIBE YOUR APPROACH REGARDING THE IMPLEMENTATION OF AN INVENTORY MANAGEMENT PROCESS. THIS APPROACH MUST ALSO INCLUDE A PROCESS THAT PROVIDES FOR THE RECALL OF MEDICAL MARIJUANA PRODUCTS AND THE MANAGEMENT OF MEDICAL MARIJUANA PRODUCT RETURNS FROM YOU TO THE ORIGINATING GROWER/PROCESSOR:**

DOH REDACTED
Pennsylvania Department of Health
Medical Marijuana Dispensary Permit Application

DOH REDACTED
DOH REDACTED
Section 15 – Diversion Prevention

A. PLEASE PROVIDE A SUMMARY OF THE PROCEDURES THAT YOU WILL IMPLEMENT AT EACH PROPOSED FACILITY FOR THE PREVENTION OF THE UNLAWFUL DIVERSION OF MEDICAL MARIJUANA AND MEDICAL MARIJUANA PRODUCTS, ALONG WITH THE PROCESS THAT WILL BE FOLLOWED WHEN EVIDENCE OF THEFT/DIVERSION IS IDENTIFIED:
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 limited to, the following: a written process for contamination prevention, pest protection procedures, medical marijuana product handler restrictions, and hand-washing facilities.

Summary

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

The company’s sanitation and safety protocols will draw from the 12 years of regulatory compliance experience by its **Chief Compliance Officer**, who is a nationally-recognized healthcare regulatory attorney and was responsible for developing the Illinois Medical Cannabis Pilot Program. The company’s Chief Compliance Officer oversaw the development of all Illinois regulations including the sanitation and safety regulations for the state’s strictly-regulated program.

The company’s **Head Pharmacist/General Manager** has 13 years of managerial retail pharmacy experience with Pennsylvania’s recordkeeping requirements, including complying with all federal and state laws and internal protocols regarding controlled substances. The Head Pharmacist has specific experience in the return and disposal of regulated products, and maintaining perpetual, monthly, and annual controlled drug inventories, and has managed several pharmacies and sanitation and safety assurance. The Head Pharmacist will be responsible for private patient information, sanitation and safety as defined by the Health Insurance Portability and Accountability Act (HIPAA). The Head Pharmacist will facilitate the role of the General Manager and will, with oversight from the Chief Compliance Officer, maintain compliance at each of the company’s proposed dispensaries.

The company will leverage the 26-year cumulative experience of its General Manager and Chief Compliance Officer in the medical marijuana compliance and pharmacy spaces successfully implementing sanitation and safety plans for controlled substances, to create its protocols. Sanitation and safety protocols will be developed using standardized guidelines found in all other regulated drug manufacturing industries:

- HIPAA.
- OSHA.
- Perpetual data tracking and statistical analysis.
- Quality assurance and quality control.
- Documented standard operating procedures.
- Regulated product testing.

# Company Policies

It is the policy of the company that the safety of its employees and the public is its foremost business consideration.

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

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

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

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

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

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

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

The company’s safety procedures will ensure the implementation of best safety practices at all times, in accordance with Occupational Safety and Health Administration (OSHA) guidelines, throughout the facility. Safety procedures will include measures for ensuring workplace safety, including, at a minimum, conducting necessary safety checks prior to dispensing medical marijuana products, as outlined by §1151.22(a)(4). Equipment requiring safety checks: alarm systems and secured entryways.

Recordkeeping

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

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

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

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

Facility Inspections

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

**Hazardous Chemical Storage**
Safety procedures will also cover proper handling and storage of any toxic cleaning compounds, sanitizing agents, solvents and pesticide chemicals used in the cleaning and pest management of the dispensary in accordance with applicable laws, rules, and regulations, as outlined by §1151.22(a)(8).

All toxic cleaning compounds, sanitizing agents, solvents and pesticide chemicals used in the cleaning and pest management of the dispensary will be labeled and stored in a manner that prevents contamination of medical marijuana and in a manner that otherwise complies with other applicable laws and regulations – §1161.34(a)(4).

**Solvents**
Solvents include 91% isopropyl alcohol – category 2 flammable liquid. Any 91% isopropyl alcohol used
for sanitization or light cleaning, stored in the production area, will be stored in a storage cabinet in compliance with local, state and federal guidelines, and adhere to OSHA standards in regards to the quantity of solvent onsite and proper storage containers. Flammable liquids stored in the production area will never exceed 10 quarts of 91% isopropyl alcohol at any given time, and total flammable liquids stored onsite or in a single storage cabinet will never exceed 60 gallons at any given time. Solvents will be stored in containers compliant with OSHA 1910.106(d)(2) and storage cabinets compliant with OSHA 1910.106(d)(3).

**Chemicals**

Chemicals include Simple Green HD Pro®, sanitizer solution, and pesticides. Simple Green HD Pro® is a non-toxic, biodegradable, non-flammable liquid used in the company’s cleaning activities, and as such does not require any special OSHA guidelines for handling and storage. Employees will follow all applicable handling and storage protocols as defined in the Material Safety Data Sheet for any pesticides and sanitizer solutions.

It is established that requirements of OSHA’s Hazard Communication standard will be met, and department managers are assigned responsibility for conducting job-specific hazard training on chemicals used by their employees. After attending training, each employee will sign a form to verify that they attended the training and understands company policies on hazard communication. Copies of Material Safety Data Sheets (MSDS) for all hazardous chemicals to which employees may be exposed will be available by hard copy in each chemical area of the department in a designated MSDS binder.

**Safety Rules**

Safety rules are provided as guidelines for safe operations. All employees will be given a copy of the safety rules upon initial employment and must sign and return the acknowledgment form after they have reviewed the safety rules and ask any questions. The safety rules will be periodically reviewed by the General Manager to ensure they are applicable and current. Safety rules include those relevant to:

- Accident and hazard reporting,
- Drug and alcohol use,
- Driving,
- Work-related injuries, and
- Required use of personal protective equipment.

Enforcement measures and disciplinary actions detailed are to be implemented in response to safety rule violations established herein. All emergency situations including chemical spill response will be handled by local emergency response agencies. Additional measures serve to establish procedures for injury claims and policies related to workers’ compensation and benefits provided. These safety rules are designed to provide employees with knowledge of the recognized and established safe practices and procedures that apply to many of the work situations encountered while employed. Employees
are responsible for consulting their department manager for guidance if in doubt about the safety of any condition, practice or procedure.

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

**Hazard Reporting**
Notify a department manager immediately of any unsafe condition and/or practice.

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

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

**Lifting**
When required to lift an item, always seek mechanical means (forklift, lift table, pallet jack, etc.) first. If an item must be lifted manually, the detailed lifting safety rules should be referred to before performing the task.

**Falls**
When working above a lower level (4 feet in general industry, 6 feet in construction) with unprotected sides, edges or openings, employees will protect themselves by use of guardrails or an approved personal fall-arrest system (e.g., lanyard, harness, anchor point).

**Personal Protective Equipment (PPE)**
Appropriate PPE must be worn at all times. Wear approved eye and face protection when performing any task that could generate flying debris. When working with chemicals, wear protective eyewear and gloves. Wear gloves when handling metal, rough wood, fiberglass and other sharp objects. Wear a hard hat when there are overhead hazards. Appropriate footwear, long-sleeved shirts, long pants and high-visibility vests, will be worn at all times.

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

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

Management reserves the right to impose any of the following disciplinary actions it deems appropriate:
• Verbal warning with documentation in personnel file.
• Written warning outlining nature of the offense and necessary corrective action with documentation in personnel file.
• Termination.

Management, including department managers, shall be subject to the above disciplinary action for the following reasons:
• Repeated safety rule violations by employees under their supervision.
• Failure to provide adequate training prior to job assignment.
• Failure to report accidents and provide medical attention to employees injured at work.
• Failure to control unsafe conditions or work practices.
• Failure to maintain sanitation standards and cleanliness in their departments.

Injury Claims
All employees will be provided with an explanation of the workers’ compensation system and the benefits it will provide to them by their department manager. In the event of a work-related injury or illness:
• The injured employee must report the event to his/her department manager or the safety coordinator before the end of the work shift.
• If the injured employee needs immediate medical attention, he/she will be driven or sent to the nearest appropriate hospital or clinic.
• If the injury is not an emergency, an appointment will be made with one of the worker’s compensation provider’s designated medical providers as soon as possible.

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

- A management accident investigation will be conducted following all work-related injuries. The department manager or safety coordinator will be responsible for interviewing the injured employee and all witnesses.
- The safety coordinator will report the claim to the worker’s compensation provider.
- If the incident involved an employee death or a catastrophe (3 or more employees admitted to the hospital) OSHA (1.800.321.6742) must be notified within eight hours, along with the Pennsylvania Department of Worker’s Compensation.
- The safety coordinator will use information from the accident investigation to identify changes that may help prevent future incidents.
- For lost time claims, the company will contact the injured employee at least once a week to answer questions, keep the injured employee informed of organization activities, and discuss return to work options.
- The safety coordinator will contact the medical provider after each appointment to keep current on the employees work status, medical progress, and to ensure that appointments are being kept.

Modified duty procedures will be as follows:

- Department managers will determine if an employee can return to his/her regular job duties and evaluate the medical restrictions.
- If an employee is unable to return to normal job duties, the department manager will determine if the employee’s position can be temporarily modified to accommodate the restrictions.
- If the job cannot be modified, the safety coordinator will evaluate other tasks or positions the employee may be able to perform until the medical restrictions are lifted.
- If an employee is unable to return safely to a modified position, the medical restrictions will be re-evaluated after each doctor’s visit to ensure the employee is returned to work as soon as possible.

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

“Right to Know”

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

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

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

Training

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

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

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

Approved Products List

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

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

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

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

### Pest Management

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

In accordance with §1161.34(a)(3), pest protection protocols will adequately protect against pests through the use of integrated pest management practices and techniques that identify and manage plant pathogens and pest problems, and through the regular disposal of trash to prevent infestation. All dispensing and storage areas will be maintained in a clean and orderly condition and free from infestation by insects, rodents, birds and pest of any kind – §1151.31(b).
Product Handling
Sanitization procedures will also cover medical marijuana handler restrictions, handwashing facilities, and lavatory access. The company will require all employees working in direct contact with medical marijuana to comply with all food handler restrictions in §27.153 and to conform to company sanitary practices while on duty, such as:

- Maintaining adequate personal hygiene,
- Wearing proper clothing, including gloves, and
- Washing hands thoroughly in an adequate handwashing area before starting work and at any other time when hands may have become soiled or contaminated – §1161.34(b).

The company will provide its employees and visitors with adequate and convenient handwashing facilities furnished with running water at a temperature suitable for sanitizing hands, effective nontoxic sanitizing cleaners and sanitary towels or suitable drying devices located in processing areas and where good sanitary practices require personnel to wash and sanitize their hands, as well as provide adequate, readily accessible lavatories that are maintained in a sanitary condition and in good repair – §1161.34(c)&(d).

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

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

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

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

Hazard Analysis Critical Control Point
Hazard Analysis Critical Control Point (HACCP) programs will be instituted to maintain product safety. HACCP is a management system, developed by the Food and Drug Administration, in which food safety is addressed through the analysis and control of biological, chemical, and physical hazards from raw material production, procurement, and handling, to manufacturing, distribution and consumption of the finished product. For the dispensing of medical marijuana, the HACCP program will focus on controlling:

- Biological (e.g., microbiological organisms and toxins) and chemical (e.g. cleaning solutions, solvents, and reagents) contamination and
- Physical hazards (e.g., faulty or defective packaging and foreign matter).

Biological and chemical contamination and physical hazards of concern and their mitigation will be specifically addressed in the company’s operations plan, as well as in the company’s sanitization and QA&QC procedures.

- All equipment used in the dispensing of medical marijuana will be cleaned and sanitized before and after each use.
- All items used in the packaging and storage of medical marijuana products will also be cleaned and sanitized prior to use.
- All product packaging will be inspected upon receiving and again prior to use - defective or faulty packaging materials will be disposed of immediately.
- Foreign matter, such as hair, dirt, debris, saliva and other bodily fluids, will be controlled or mitigated using proper PPE, like hairnets, face masks and gloves.

Through the use of HACCP programs, the company will ensure that all pieces of equipment, work surfaces, and packaging materials are free of biological and chemical contamination, as well as physical hazards, and are safe for use.

The QA&QC procedures will ensure all medical marijuana distributed by the company is tested for contaminants and cannabinoid profile in compliance with testing guidelines published by the Department, and that the results of all testing are maintained for more than one year. The QA&QC procedures will ensure all medical marijuana is dispensed in a safe and sanitary manner, and only medical marijuana that indicates it has passed a visual inspection and contaminant analysis verifying it as free of seed and stems, dirt, sand, debris and/or other foreign matter, and contains a level of mold, rot or other fungus or bacterial diseases acceptable to the Department will be dispensed – §1151.27(h).

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
Summary
The company will create a Recordkeeping, Reporting, and Notifications Plan for ensuring the maintenance of true, complete and current records at each of its dispensary locations. Measures for the maintenance of records relevant to operating procedures, inventory records including seed-to-sale tracking, personnel records, staffing plans, personnel policies and procedures, waste disposal, product testing and recall records, criminal offense reports, security records, designated business records and additional required Department reporting will be established to ensure confidentiality and prevent the disclosure of information about company personnel, contractors, clients or patients.

All records will be handled in a manner similar to protected medical records. The company’s dispensary recordkeeping plan will be in compliance with the rules and regulations of the Department and incorporate the best practices found in other highly regulated drug manufacturing industries (e.g. HIPPA, OSHA, FDA, etc.). The company’s recordkeeping policies and procedures demonstrate not only compliance with the Commonwealth requirements but also a commitment to full and transparent documentation of its operations.

Relevant Experience
The company will utilize the combined experience the team has compiled from industry specialists who have successfully operated in regulated medical marijuana businesses throughout the country.

In particular, the company’s internal recordkeeping system will draw from the 12 years of regulatory compliance experience by its Chief Compliance Officer, who is a nationally-recognized healthcare regulatory attorney and was responsible for developing the Illinois Medical Cannabis Pilot Program. As the Pilot Program’s first statewide coordinator, the company’s Chief Compliance Officer oversaw the development of all Illinois regulations including the recordkeeping regulations for the state’s strictly-regulated cultivation program. The Chief Compliance Officer has helped develop national best-practices in inventory management for medical marijuana, assisted in compliance oversight of Illinois’ nearly 60 licensed dispensaries, and has regularly advised other state and local governments on medical marijuana compliance standards and assists private medical marijuana business clients in over a dozen states with regards to inventory control matters.

The company’s Chief Security Officer has a combined 30+ year career with the Skokie, Illinois, Police Department, United States Secret Service, National Basketball Association, HillardHeintze security company, and medical marijuana industries; and also has project management experience with numerous large-scale security engagements where he secured medical marijuana facilities, corporate headquarters, industrial plants, retail sites, commercial properties, educational institutions, private residences, government buildings, entertainment venues, medical centers, and professional sport stadiums and arenas. The Chief Security Officer has created security plans for multiple medical
marijuana dispensary and grower/processor businesses that were issued licenses in the State of Illinois, underscoring the importance of a comprehensive security plan. To this point, the Chief Security Officer’s experience in successfully establishing and evaluating security plans will allow the company to ensure it can prevent diversion of records and other critical data and show clear evidence of compliance. The Chief Security Officer will ensure the company’s security objectives, regarding recordkeeping, are achieved through prevention-oriented planning, implementation of security best practices, and the latest technology to deter, secure, monitor, and mitigate risk in all aspects of the company’s operations.

The company’s **Chief Operations Officer** is currently an owner-operator at a USDA Inspected Meat Processing Establishment in Butler, PA recognized as the 2015 Business of the Year. The Chief Operations Officer has been a small business leader for 10 years, and maintains an establishment that achieves regulatory compliance under Food Safety & Inspection Service on a daily basis and has knowledge, skill and/or experience in regulated recordkeeping policies. By working closely with project stakeholders including Bayer/Medrad, University of Pittsburgh Chevron Science Center, PA Department of Corrections, Federal Bureau of Prisons, Latrobe Specialty Steel, Allegheny Technologies Incorporated, Heinz Hall, Benedum Center, ThyssenKrupp and others, the Chief Operations Officer has helped numerous local, regional, national, and international clients achieve project goals in a compressed timeframe. The company’s Chief Operations Officer has experience in gathering and planning data and lead times with contractors, equipment vendors, procurement coordinators, customs inspection and permitted vehicle load transfers, as well as maintaining related records.

The company’s **Chief Financial Officer** has worked with financial records and assisted in the collection and protection of financial records for the past 15 years. During his tenure in investment banking, the Chief Financial Officer dealt with a significant amount of confidential financial and personal information, related to both public and private transactions. The company’s Chief Financial Officer is currently the Director of Sales and Business Development at Champlain Valley Dispensary (CVD), the largest medical marijuana organization in Vermont, and maintains CVD’s financial records through the use of MJFreeway’s software system and ensure financial compliance; and coordinated the integration of the new accounting, point-of-sale and manufacturing software system for CVD, to have a comprehensive accounting and compliance software system for the retention of critical information and documentation. When financial record discrepancies are identified, the Chief Financial Officer will use this experience to assist upper-management team and the General Manager in resolving issues and create reports.

The company’s **Chief Executive Officer** has 13 years of experience in commercial banking and real estate, compliance, consulting, marketing, and sales, and has been operating a vertically integrated medical marijuana company since 2009. The Chief Executive Officer has extensive experience with updating and keeping records physically on-site and electronically through point-of-sales systems in real-time to organize and analyze data to implement internal policies and procedures with greater efficiency and to also aid in the ongoing compliance of federal and state financial, employment, and
regulatory policies.

The company’s **Head Pharmacist/General Manager** has 13 years of managerial retail pharmacy experience with Pennsylvania’s recordkeeping requirements, including complying with all federal and state laws and internal protocols regarding controlled substances. The Head Pharmacist has specific experience in the ordering, receiving, storing, dispensing, labeling, providing of printed patient information and receipts, returning and disposing of quarantined/regulated products, and maintaining perpetual, monthly, and annual controlled drug inventories, and has managed several pharmacies and the various forms of records that have to be maintained. The Head Pharmacist will be responsible for private patient information storage and disposal of medical marijuana products as defined by the Health Insurance Portability and Accountability Act (HIPAA). The Head Pharmacist will facilitate the role of the General Manager and will, with oversight from the Chief Compliance Officer, maintain recordkeeping compliance at each of the company’s proposed dispensaries.

**General Requirements**

The company will ensure compliance with all laws and regulations pertaining to its dispensary operations including recordkeeping. Operational needs of the company require records in excess of the mandated requirements; therefore, the company’s recordkeeping policies and procedures will cover, but are not limited to:

- Employee files,
- Patient records,
- Records of inventory and all dispensing transactions.

The company has adopted procedures for maintaining records compliant with Department, medical marijuana regulations and best practices for the pharmaceutical sectors. All employees will adhere to recordkeeping policies and procedures unique to their role and responsibility as a condition of employment.

The company will implement an operations plan detailing its procedures and equipment for recording and upkeep of:

- Company employee policies,
- Security policies and protocols,
- Day-to-day operations,
- Workplace safety,
- Maintenance, cleaning and sanitation of each dispensary,
- Inventory management and reporting,
- Complaints and recall procedures, and
- Electronic tracking system (ETS) interface in accordance with applicable laws, rules and regulations – **§1161.29(a)(1)-(8)**

and will be retained for at least 4 years. The company’s recordkeeping plan will outline operational
procedures in compliance with state law and regulations and will be available upon the Department’s request.

Training and Accountability

The upper-management team (above) and the General Manager will collaboratively develop the company’s:

- Recordkeeping standard operating procedures (sops),
- Employee training program and implementation,
- Ongoing compliance reviews, and
- Randomized audit protocols.

In the event that a discrepancy is noted regarding recordkeeping, the General Manager will work with upper-management on appropriate employee retraining, reviews and modifications to SOPs, reporting to the Department and local/state law enforcement (whenever appropriate), and strategic planning with regards to mitigating and eradicating any compliance violations. The General Manager is assigned responsibility for recordkeeping, the proper integration and enforcement of requirements into policies and procedures, maintaining a current organizational chart and job descriptions for each employee position, and making all records available to the Department or its authorized representatives upon request for monitoring, on-site inspection and audit purposes.

Failure on behalf of the General Manager to retain appropriate records, prevent unauthorized alteration/access or comply with company and Department recordkeeping protocols will result in immediate termination and notification of the Department.

Recordkeeping

The company will maintain the following categories of records:

- Standard operating procedures.
- Inventory records.
- Confidential patient records.
- Patient profiles.
- Dispensing history.
- All dispensed medical marijuana products and periods of no-fill (zero report).
- Dispensing errors.
- Allergy and adverse event reporting.
- Medical marijuana product recalls.
- Daily temperature log for temperature sensitive product, if applicable.
- Employee records and policies.
- Waste disposal records.
- Maintenance records.
- Company assets and liabilities.
• Fixed asset schedules.
• Insurance and escrow requirements.
• All monetary transactions.
• Books of accounts including journals, ledgers and supporting documents, agreements, checks, invoices, vouchers, monthly and quarterly reports and annual audits.
• Sales records.
• Medical marijuana purchased and pricing records.
• Salary and wages paid to each employee.
• Stipend paid to upper-management and any executive compensation, bonus, benefit or item of value paid to any individual affiliated with the company.

The company will document and retrieve recordkeeping information using the Department’s approved ETS with both on- and off-site storage that provides sufficient backup capabilities. The company will maintain the dispensary data in its ETS, comprised of the required hardware, data storage equipment and software for all operating functions, and in a secure document management system to store any hard copy records. In the event of a closure, the company will implement the codified organizational procedures and actions to store and make available to the Department all records.

Reports
The company will submit reports summarizing the amount of medical marijuana purchased by the company during the period for which the report is being submitted, the per-dose price of any amount of medical marijuana purchased by the company from any grower/processor, and the per-dose price of any amount of medical marijuana dispensed to any patient or caregiver to the Department at the end of the first 12-month operational period, and every 3-month period thereafter – §1141.46(a)(2).

The company will make available any operational and financial information necessary for ongoing reporting or for the Department to carry out its responsibilities under the Act and §1141.46(d).

The electronic tracking and secured document management systems will be used to produce the reports upon request, disclosing:
• Medical marijuana received from a grower/processor.
• Medical marijuana products in inventory.
• Medical marijuana dispensed to each patient/caregiver.
• Damaged, defective, expired, contaminated, returned, withdrawn or recalled products.
• Medical marijuana waste awaiting disposal.
• An audit trail of all inventory adjustments.

The Chief Compliance Officer will be responsible for the proper integration of these requirements into policies and procedures – §1161.32(a).

In addition to the company’s legal obligation to protect patient information, it has a responsibility to
the stakeholders and the Department to accurately document the business’ activities. True and accurate reports maintained in a timely and organized manner will provide real-time operating information for making quick and informed decisions regarding sourcing. To streamline this process, the company will keep and maintain the following reports:

- **“Total inventory in storage” report** - Records, by location and batch, user, date, time, item, quantity and storage access in chronological order.
- **“All events” report** - Provides detail on all user activity and transaction types within a time frame, custom tailored to the user’s information request.
- **“Review send” report** - Provides detailed information regarding the removal of medical marijuana products and waste from the storage area, specifying the user, time, date, item, quantity and intended destination.
- **“Purchase history” report** - Helps trend the receipt of medical marijuana products in and out of inventory and monitor purchase patterns by the company and registered patients and caregivers.

### Complying with Inspections and Audits

The Department is at liberty to conduct announced or unannounced inspections, investigations or audits of the company’s books, records, papers, documents, data, and other physical or electronic information – §1141.45(a)&(b)(1). To comply with these regulations, the company will ensure all documentation requested by the Department including all corporate documents required by law, such as meeting minutes, annual reports, stock or membership agreements are easily accessible for on-site inspection and audit purposes.

During an inspection, investigation or audit, the company will provide copies and free access to all required information that relates to the company’s dispensary operations, including:

- Financial data.
- Sales data.
- Shipping data.
- Pricing data.
- Employee data.

§1141.45(c)

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

**Annual Security System Audits Required**
The Chief Security Officer must, on an annual basis, obtain a security system audit by a vendor approved by the Department. A report of such audit must be submitted, in a form and manner determined by the Department, no later than 30 calendar days after the audit is conducted. If the audit identifies concerns related to the company’s security system, the Chief Security Officer must also submit a plan to mitigate those concerns within 10 business days of submitting the audit and document all findings in the company’s internal records.

**Types of Records and Data Stored**

**Security Footage**
The company’s surveillance system will have the ability to record and upload all images captured by each surveillance camera to a digital repository, in a format that is easily accessed for investigative purposes, and will be kept in a locked cabinet within a restricted access area, only accessible by authorized security personnel, at the facility—§1161.31(a)(4)(i).

**Employee and Payroll Data**
The company will maintain records documenting the salary and wages paid to each employee, the stipend paid to each executive manager and any executive compensation, bonus, benefit or item of value paid to any individual affiliated with the company, including executive managers. The company will also securely retain employee performance evaluations, disciplinary records, resumes, proof of credentials, including successful completion of the Department’s 4-hour training course for medical professionals – §1161.25(a), and the 2-hour course for all personnel – §1141.48(a), and other confidential employee information. These confidential records must be maintained for a recommended period of at least seven years or longer if required by law.

**Standard Operating Procedures**
The company will maintain a detailed description of plans, procedures and systems adopted and maintained for tracking, recordkeeping, record retention and surveillance systems, relating to all medical marijuana at every stage including delivery, transporting, distributing, sale and dispensing by each proposed dispensary.

**Dispensed Medical Marijuana Data**
The company will collect information regarding any recommendations, requirements and/or limitations as to the form or dosage of medical marijuana for each patient in a patient file – §1161.23(b). The company will maintain and update each patient’s file with any recommendation as to the form or dosage of medical marijuana in the ETS at each of its dispensaries – §1161.23(b)(2)(iii).

The company will also maintain a record of the medical marijuana dispensed to a patient or caregiver
– §1161.32(a)(2). The General Manager will ensure that patient records are only accessed by authorized employees to maintain or update patient certification information. This will protect the patient from loss, damage or unauthorized use of their filed certification. The General Manager will ensure that established safeguards prevent unauthorized access are used and that the date and time of an entry in a patient record are recorded automatically.

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

- The name, address and permit number of the respective dispensary.
- The name and address of the patient and, if applicable, the patient’s caregiver.
- The date the medical marijuana was dispensed.
- Any requirement or limitation noted in the patient’s file.
- The form and the quantity of medical marijuana dispensed.

§1161.23(c)(1)-(5)

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

The company will keep a “dispensing” record that provides detailed information regarding the transaction of medical marijuana products at each dispensary, indicating the user, time, date, item, quantity and inventory movement. The company will produce a “vault compare” record that allowing the cross-reference of inventory that leaves the storage area and arrives at the shelf, dispensary or any other location. Transactions that do not match by location, item, quantity, date, time and user show up on this report and will immediately notify the company of any unauthorized access or diversion.

Inventory Data

The Inventory Manager is accountable, with oversight by the General Manager, for implementing and maintaining inventory data storage policies and procedures. The company will maintain a record of the medical marijuana received from a grower/processor in its ETS– §1161.32(a)(1), and will ensure that two employees, overseen by the Inventory Manager, will be present to receive and document all deliveries. All employees will remain with the delivery until all items (weight, type and barcode/identifying information) have been entered into the ETS and secured in the storage area.

The Inventory Manager, with direction from the General Manager, will oversee daily paper and electronic entry of all inventory transactions.

- The company will maintain an inventory log to record the date of each inventory process,
a summary of the inventory findings and the names, identification numbers, signatures and positions/titles of the individuals who conducted the inventory at each dispensary – §1161.32(c).

- To show due diligence with the Department, the company will also maintain a record of all returned, damaged, defective, expired or contaminated medical marijuana awaiting transfer to a grower/processor or awaiting disposal at each of its dispensaries—§1161.32(a)(3).

## Cycle Count Data

The company will establish inventory controls and procedures at each of its dispensary locations to conduct monthly inventory reviews of batches of medical marijuana and comprehensive inventories at its facility of these items on an annual basis – §1161.32(b). Data regarding each batch of medical marijuana received from a grower/processor, partially or completely distributed, stored for future sale or disposal and the name of any patient or caregiver who received product from any respective batch will also be collected and reviewed to:

- Aid in the company's anti-diversion practices,
- Help prevent dispensing errors and analyze usage trends to identify problematic usage or misuse of products by registered patients,
- Assist with tracking product complaints and withdrawals and recalls, and
- Streamline product ordering, demand estimation, inventory management and analysis of medical marijuana product success rates corresponding to the 19 approved indications.

All counts will be recorded in the inventory log and entered into the ETS immediately upon completion.

Cycle count data metrics:

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

In addition to maintaining inventory data in the ETS, the company will establish the following inventory controls for the Department’s monthly and annual inventory requirements:

- A log book with Medical Marijuana Perpetual Inventory Tracking and Dispensing Logs (written record) for each product UPC containing:
  - Date.
Employee name/title/signature.

Invoice and/or tracking number for received or returned product; or Dispensing transaction number (“tx number”) - these will cross-reference data maintained in the ETS.

Batch/Lot #.

Dispensed, received, or returned quantity.

Expected quantity on-hand.

Actual (physical count) quantity on-hand.

Monthly inventory review.

- A separate written inventory record will be maintained for comprehensive Annual Inventory and will contain:
  - Date and time of inventory.
  - Alphabetical list of all inventory (both active product and product quarantined for return/destruction) - electronically generated from the ETS.
  - UPC code or another product identifier.
    Quantity expected (based on ETS inventory number).
    Actual quantity counted.

Name, signature, and title of person conducting the inventory.

Summary section of any findings and discrepancies and, if necessary, information reported to the Department.

Disposal Data

The General Manager will coordinate the transfer of returned, damaged, defective, expired or contaminated medical marijuana back to the grower/processor from whom it was purchased – §1161.38(c). The company will work with the Department to oversee disposal and ensure that the medical marijuana is disposed of in a manner that will not pose a risk to public health and safety when required – §1151.42(f). All medical marijuana waste and will be recorded in the product disposal log, including information regarding the date of disposal, the type and quantity awaiting disposal, the manner of disposal, if applicable, the reason for return/complaint and the name of the patient who supplied the waste, if applicable. Any salvage of medical marijuana products by the company’s employees will be strictly prohibited and is cause for immediate termination.

Shipping & Receiving Data

The company will adhere to all established policies whenever medical marijuana products or medical marijuana waste are transported out of a dispensary for any reason. As required by §1161.36(a);(d)&(e), all shipments to and from any of the company’s dispensaries will be accompanied by a manifest which the General Manager will verify as accurate and record in the company’s ETS, as well as provide a copy to the receiving medical marijuana organization and the Department.

The company will record and keep the following required forms of shipping and receiving data using a
log sheet:

- Name, address and permit number of the dispensary and the name and contact information for the General Manager.
- Name, address and permit number of the medical marijuana organization receiving the delivery and the name and contact information for a representative of the medical marijuana organization.
- Quantity of each medical marijuana batch/lot contained in the transport, along with their identification numbers.
- Date and approximate time of departure.
- Date and approximate time of arrival.
- Transport vehicle’s make, model, and license plate number.
- Identification number and signature of each member of the delivery team accompanying the transport.

The company will require each recipient to provide the delivery team with a printed receipt acknowledging the transportation manifest was correct and that the medical marijuana was accepted – §1161.36(b). It is the responsibility of the General Manager to ensure all receipts are recorded in the ETS and filed at the dispensary – §1161.36(c).

The Inventory Manager, under the oversight of the General Manager, will ensure that any received medical marijuana product is identified with a distinctive UPC code for each lot in the shipment before being logged into inventory and recorded in the ETS. The code will be used in all transactions pertaining to the lot including processing, sales, transfers, disposals or any other transaction impacting quantities recorded for the lot.

**Transportation Manifest Discrepancy Data**

The company will refuse acceptance of all deliveries and immediately report shipment errors/issues to the Department, and appropriate law enforcement authorities, upon discovery of any discrepancies in the transportation manifests provided to any of its dispensaries by another medical marijuana organization – §1161.37(a). The company will record the date, time, delivery team information and location of a theft or diversion in the ETS and adverse events log. The company will report all thefts or diversion immediately to the Department, and to law enforcement, upon discovering evidence, or reasonably suspects, a theft or diversion of medical marijuana products during transport – §1161.37(b). Data collected in the company’s ETS will be used to streamline investigations that will allow the company to determine if the discrepancies in the shipment occurred on its end or on the supplier’s side, and generate reports of the investigation for the Department in a timely manner – §1161.37(c)(1)&(3). Conclusions drawn from these reports will allow the company to amend its SOPs, if necessary, to prevent future discrepancies between the quantity or description of inventory listed in the transport manifest and the quantity or description of inventory actually delivered/received – §1161.37(c)(2).
Data Regarding Evidence of Loss or Theft
Any loss or theft of medical marijuana or medical marijuana products during transportation will be reported immediately to the Inventory Manager, in a loss/theft report, who will notify the General Manager immediately. The General Manager will ensure that all theft or loss reports originating from any department are reported to the appropriate law enforcement agency and the Department as required by regulations and fully documented in the company records.

Visitation Records
As required by §1161.30(e)(1)&(2), the company will maintain a visitors log for four years and will make the log available to the Department containing the full name of each visitor, the visitor identification badge number, the time of arrival, the time of departure and the purpose of the visit, including the areas of the site and the facility visited and the name of each employee visited, as well as the name of the employee who escorted the visitor while on the property.

Personnel Security Access/Clearance Records
As required by §1161.31(g)(1) the company will maintain a current list of authorized employees and service employees or contractors who have access to various levels of secured limited access areas within each dispensary. The General Manager will maintain accurate records for each dispensary and employee including:
- All materials submitted to the Department.
- A copy of their Department issued registration.
- Documentation of verification of references.
- Job description or employment contract that includes a description of duties, authority, responsibilities, qualifications and supervision.
- Documentation of all training received by the employee and the signed acknowledgement of the employee indicating the date, time and place the training was received and the topics discussed, including name and title of trainers.
- Documentation of periodic performance evaluations and a record of any disciplinary action taken.

Physical and Digital Record Retention
The General Manager must ensure physical and digital records, including recordings from all video cameras, are available for immediate inspection by authorities or the Department for the time period requested. The company’s policy is to retain data and these recordings for a minimum of four years on-site and off-site as necessary per Department regulations. Data and video recordings will be retained as long as necessary in case the company becomes part of a pending criminal, civil or administrative investigation or legal proceeding for which any recording may contain relevant information – §1161.31(b)(6)(ii).
The General Manager, in coordination with the upper-management team and Chief Security Officer, will ensure the proper retention of all physical and digital records. As required by §1161.31(b)(3), the company will retain records of all inspections, servicing, alterations and upgrades performed on its surveillance and ETSs at each of its dispensaries for at least four years, and will make these records available to the Department and its authorized agents upon request. As required by §1161.31(b)(6)(i), within two business days following a request, the company will provide up to four screen captures of an unaltered copy of a video surveillance recording and any other required documents to the Department or its authorized agents, law enforcement, or other federal, state or local government officials, if necessary.

### Physical and Digital Record Storage

The company will keep all records (paper and electronic) in a secure location so as to prevent theft, loss, destruction or alterations. Physical records will be kept in a locked fire-proof cabinet within a restricted access area, only accessible by authorized security personnel and select upper-management. Electronic records will be kept in a digital repository secured to the floor in a locked fire-proof cabinet within the security and surveillance room. A current list of authorized employees and service personnel that have access to the physical and electronic records will be maintained at the grower/processor facility and enforced by the General Manager and Chief Security Officer. The company will also maintain a secure back-up of its surveillance system’s digital repository and all electronic records off-site, as required by the Department – §1161.31(a)(4)(ii)&(e).

[Redacted]
Example: Fire-proof Cabinet

### Unauthorized Alteration of Records

Any loss or unauthorized alteration of company records discovered or suspected by any employee must be reported to the Chief Compliance Officer or General Manager, if not onsite, immediately.

- The General Manager will report such incidents to the Department and law enforcement as necessary, and record all such incidents in the incident log.
- Upon discovery of a records security breach, the General Manager must review all recordkeeping and security policies to identify deficiencies and necessary corrective measures.
- Incident reporting must be documented by the General Manager and reported immediately to upper management, in accordance with company reporting and notifications policies and procedures.
- The company shall also provide, and train employees with regards to, an anonymous reporting process through electronic communication that will be confidentially shared with the company’s Compliance Officer.
- All incident activities, from receipt of the initial report through post-incident review, are
to be documented and recorded in the ETS.

The General Manager and Chief Compliance and Chief Security Officers are responsible for ensuring all events are recorded, assembling these records in preparation and performance of the post-incident review and ensuring all records are preserved for inspection and auditing.

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

SECTION 18 – ORGANIZATIONAL STRUCTURE

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<td>PA Workers’ Compensation Policy Number (if applicant is currently doing business in Pennsylvania):</td>
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The applicant affirms that workers’ compensation insurance will be obtained by the time the Department determines you to be operational under the Act and regulations. ☒ 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:
Summary
The response will describe the applicant’s business history and ability to plan and maintain a successful medical marijuana operation, and show it has the financial fitness and operational understanding necessary to get each of its dispensary locations up and running within six months from being issued a permit, and to remain operational and compliant once business activities have commenced, while preventing diversion and complying with all applicable rules and regulations of the Commonwealth.

The company has assembled an executive management team of medical marijuana, controlled substance, security, compliance, financial and operational experts and specialists to get its dispensary facility operational within six months from receiving a permit. Each team member was selected specifically because of his or her knowledge and hands-on operational experience within the medical marijuana industry.

Business History

Chief Executive Officer
The company’s choice for Chief Executive Officer founded Live Green Consulting in Denver, Colorado and first became involved in the medical marijuana industry in 2009. The company’s Chief Executive Officer is also the Managing Partner and CEO of FGS Inc., Patients Choice of Colorado and Live Green Cannabis, an industry leading state legal medical and recreational marijuana company holding 26 state and local licenses that operate across four locations in the Front Range of Colorado and two large-scale cultivation operations that employ upward of 75 state licensed employees.

Currently the Chief Executive Officer serves on the Executive Board of the Marijuana Industry Group (MIG), which is the largest industry trade organization in Colorado, along with being a Sustaining Member of the National Cannabis Industry Association (NCIA). Most recently, the Chief Executive Officer has been selected to be a Founding Board Member of the Council for Responsible Cannabis Regulation (CRCR) and a funding Founder of Women Grow. Outside of the Chief Executive Officer’s vertically integrated operating experience in Colorado, the company’s Chief Executive Officer also consults in two of the country’s extraction-only markets, both Minnesota and New York, which share similar programs to the Medical Marijuana Act in the Commonwealth of Pennsylvania.

Since 2010, the Chief Executive Officer has been proactive in the legislative, rule-making, and licensing processes that have created regulatory framework at both the state and local levels, and most recently served on the Colorado State Licensing Authority’s A64 Working Groups several times as member and stakeholder for the Production Management, Licensing, Licensed Premises, Transportation and Storage, Taxation, as well as the Testing and Random Sampling work group. The Chief Executive Officer is actively involved in promoting the public policy for Amendment 20 and 64, 280E tax reform, and banking solutions that will help to shape the future of this industry. The Chief
Executive Officer graduated from Miami University in 2003 with a Bachelor of Arts in Organizational Communication, and has 13 years of experience in commercial banking and real estate, compliance, consulting, marketing, and sales. The Chief Executive Officer previously worked with BNP Paribas and Bank of the West during the infancy years of medical marijuana.

Chief Operations Officer
The company’s Chief Operations Officer is currently an owner-operator at a USDA Inspected Meat Processing Establishment in Butler, PA, and was awarded the 2015 Business of the Year by Butler Downtown, a state-certified Main Street program following the National Trust for Historic Preservation’s Main Street Four-Point Approach to revitalization. As a small business leader, the Chief Operations Officer was integral in building a revenue program that allowed Miller’s Quality Meats to hire an additional 15 employees to support revenue growth for new business opportunity.

Prior to joining Miller’s Quality Meats, the Chief Operations Officer worked in the design and construction industry with a focus on Operations Management for Department of Defense and Federal Programs for STEVENS Engineers & Constructors, and was responsible for ensuring they were in a position to deliver the design and execution of construction projects to public sector clients on time and under budget. While at STEVENS Engineers & Constructors, the Chief Operations Officer utilized project management and control methodology and tools to help stakeholders achieve objectives and goals.

The company’s Chief Operations Officer was instrumental in supporting the education and leadership of best practices for medical marijuana in the Commonwealth by forming the Pennsylvania Medical Cannabis Society (PAMCS). In support of Act 16, PAMCS has worked with members of the PA Senate & House of Representatives in holding town hall, community outreach, law enforcement, potential patient, career seeking, medical professional, banking and other events in the Pittsburgh, Harrisburg, and Philadelphia regions.

Chief Financial Officer
The company’s Chief Financial Officer graduated from Babson College in Massachusetts, with a degree in Finance and Investments, and upon graduation, joined PricewaterhouseCoopers as a consultant in their bankruptcy and corporate recovery business unit. After spending almost two years at PricewaterhouseCoopers, the Chief Financial Officer ventured into investment banking career by working for Fahlenstock & Co. Inc., now Oppenheimer & Co. from 1999 through 2001. As an analyst in their investment banking division, the Chief Financial Officer gained first hand, real-world experience working on initial public offerings for clients along with private capital raises and mergers and acquisitions. After leaving Oppenheimer & Co., the Chief Financial Officer joined TM Capital Corp. a private Mergers and Acquisition firm, focused on middle market transactions. The Chief Financial Officer was employed by TM Capital Corp. from 2001 through 2003, rose to level of Associate within their organization, and worked on a number of merger and acquisition transactions.
After TM Capital, the Chief Financial Officer worked for Ladenburg Thalmann & Co. Inc. a boutique investment banking firm from 2004 through 2009, and gained the title of Vice President. The Chief Financial Officer was responsible for the deal execution of a majority of the firm’s investment banking clients. The Chief Financial Officer assisted in a number of Initial Public and Follow-on offerings for middle market clients. While working at Ladenbrugh Thalmann, the Chief Financial Officer completed his Master’s in Business Administration at the Gabelli School of Business at Fordham University.

After the recession in 2008 the Chief Financial Officer worked for two former colleagues from Ladenburg Thalmann, who were starting their own financial advisory firms. After a little over a year with these two companies, the Chief Financial Officer was hired by Credit Agricole Securities (USA) in 2010, the U.S. division of Credit Agricole (a Paris based investment bank) and worked for the company until 2013. At Credit Agricole, the Chief Financial Officer was a Director in the Equity Capital Markets division, with industry cover for REITs, healthcare and consumer products. Through the two and one-half years at Credit Agricole, the Chief Financial Officer gained significant industry knowledge on the healthcare industry, through pitching and executing on deal transactions.

After experiencing a downsizing in the firm in 2013 the Chief Financial Officer become a Managing Director for a start-up company called I-Bankers Direct, specializing on small crowd funding transaction. After working for I-Bankers for the company for 10 months, the Chief Financial Officer was contacted by a publicly traded company Medallion Financial Corp. (Medallion), who was interested in making investments in the legal medical marijuana industry throughout the United States. The Chief Financial Officer was hired in 2014 as a consultant for the company, in charge of developing a business plan and executing on investment opportunities within the medical marijuana space. During 2014, the Chief Financial Officer established numerous business and professional contacts with the medical and adult-use marijuana industries and was able to deliver to the investment committee of Medallion six different transactions with value of over $30.0 million.

After the Chief Financial Officer’s consulting agreement finished for Medallion, the Chief Financial Officer formed the financial advisory firm, Virentium Advisors LLC, in 2015, to serve the regulated medical marijuana industry from both an operational and strategic advisory role.

**Chief Security Officer**

The company’s Chief Security Officer has a combined 30+ year career with the Skokie Police Department, United States Secret Service, National Basketball Association (NBA), Hillard Heintze, and medical marijuana industries. The Chief Security Officer graduated from Western Illinois University with a degree in Law Enforcement Administration, and began a professional career with the Skokie, Illinois Police Department and then became a Secret Service agent in the Chicago Field Office, as well as holding an M.S. in Criminology from Indiana State University.

The Chief Security Officer is currently the CEO of The Lake Forest Group, one of the most premier security firms in the country, and has been exposed to a variety of security challenges and gained valuable strategic security expertise. The Chief Security Officer’s project management experience
includes securing medical marijuana facilities, corporate headquarters, industrial plants, retail sites, commercial properties, educational institutions, private residences, government buildings, entertainment venues, medical centers, and professional sport stadiums and arenas.

With unrivaled experience in the security industry, the Chief Security Officer provides insight acquired through decades of engagements by providing protective security for organizations and industries in:

- Private sector such as Fortune 500 corporations, hotels, resorts, casinos, and gaming;
- Security-related fields in the public sector, such as K-12 schools, higher education institutions, hospitals, and government buildings,
- Assessing emergency preparedness and event security for venues and stadiums in professional golf, horse racing, professional soccer, Major League Baseball (MLB), the National Football League (NFL), and the National Basketball Association (NBA).

By leveraging established liaisons with high-level law enforcement and international counterparts in both the public and private sector, the Chief Security Officer brings a truly global security protection plan to the company.

The Chief Security Officer will draw from experienced gained as the Owner and CEO of The Lake Forest Group, the strategic security firm Hillard Heintze, the NBA, and an extensive career as a Special Agent with the United States Secret Service to guide the company through the regulatory hurdles surrounding product, facility, and personnel security. The Chief Security Officer’s project management experience includes leading engagements with Domino’s, Bain Capital, Marathon Petroleum, Augusta National Golf Club, Major League Baseball, American Express, FedEx, Chrysler, Blue Cross Blue Shield, DePaul University, Rush University Medical Center, Navy Pier, McCormick Place, Illinois State Capitol, Iron Mountain, and Mars Corporation.

As a Senior Vice President and Managing Director with Hillard Heintze, the company’s Chief Security Officer was in charge of the Strategic Security Services for the firm, and led numerous large-scale security engagements, including projects with major entertainment venues, gaming facilities, commercial properties, educational institutions, pharmaceutical operations, utility companies, property management firms, financial services, manufacturing and distribution plants, and professional sports.

As the Senior Director of Security for the NBA, the Chief Security Officer managed and coordinated global security, as well as designed and implemented site security measures, emergency evacuation programs, and contingency procedures; and was responsible for monitoring all NBA criminal investigations and security-related incidents throughout the league. The Chief Security Officer implemented and supervised security for the NBA All-Star Game, the NBA Finals, and the World Basketball Championships.

The Chief Security Officer was a Special Agent with the United States Secret Service for 21 years and finished his career as the Assistant Special Agent in Charge for the Dignitary Protective Division at USSS Headquarters in Washington, D.C., and was the event coordinator for the 2002 Winter Olympics.
in Salt Lake City and a security adviser to the 2003 and 2004 Super Bowls. Other assignments in Washington, D.C. were to the Presidential Protective Division and the Counter Assault Team. The Chief Security Officer’s major event experience provides an institutional knowledge in securing and protecting facilities and people on a large scale, and has created security plans for the following major events: Super Bowl, Kentucky Derby, Indianapolis 500, Breeders’ Cup, and the Women’s Soccer World Cup.

In 2015, Chief Security Officer facilitated the security management and integration for the Northshore Alternative Therapy Medical Cannabis Dispensary in Highland Park, IL., and design and creation of a comprehensive security standard to mitigate risk to customers, employees, products, operations, and company, as well as served as main liaison with state regulators and local officials.

**Chief Compliance Officer**

The company’s Chief Compliance Officer is a health care regulatory and policy attorney with extensive experience in public service and the private sector. The Chief Compliance Officer helps hospitals, health systems, consulting firms, pharmacies, advocacy groups and other clients:

- Better understand the effects of federal and state health care reform legislation,
- Ensure compliance with evolving regulatory requirements,
- Implement industry best practices and navigate complex relationships between lawmakers, government officials and law-enforcement agencies; and
- Has extensive experience in the still-developing medical and adult-use marijuana industries.

Now working at Much Shelist, P.C., a Chicago-based full service law firm, the Chief Compliance Officer manages the Cannabis Industry Practice Group. He continues to advise over a half-dozen governments in the development of their medical marijuana programs, while assisting over thirty marijuana business clients across the country. The Chief Compliance Officer serves as compliance counsel to a number of licensed medical marijuana businesses in heavily regulated states such as Illinois and Maryland. The Chief Compliance Officer has earned a national reputation for setting the gold-standard for regulatory frameworks for medical marijuana industries, while staying true to the medical marijuana patients at the core of all state programs; and also represents a variety of healthcare providers, such as health systems and long-term care facilities, with regards to regulatory compliance on all matters involving state licensure or federal certification.

The Chief Compliance Officer is well known within the medical marijuana industry for developing the statewide program in Illinois. As the first statewide project coordinator for the State of Illinois Medical Cannabis Pilot Program, the Chief Compliance Officer was appointed by the Governor of Illinois to develop and implement a regulatory framework for the use of medical marijuana by eligible patients.

As leader of the Illinois medical marijuana program, the Chief Compliance Officer oversaw the efforts of five state agencies and more than 50 employees charged with creating:

- Program rules and fees,
- Laboratory testing and database systems, and a
• Selection process for licensed dispensary facilities and cultivation centers.

Managed a multimillion-dollar state fund to create and maintain:
• A system of operations,
• Detailed tracking capabilities,
• Policies to assure patient safety, proper enforcement of laws and regulations, and
• Public education campaigns;

And regularly consulted with medical marijuana program directors across the country on best practices, unique challenges, and repeatable successes across a variety of states.

The Chief Compliance Officer also served as general counsel for the Illinois Department of Public Health, and advised the agency director and senior staff on a broad range of complex legal issues, including licensure of health care facilities, emergency preparedness, maternal and child health initiatives, mental health and developmental disability facilities, and food safety; and supervised the department’s legal team and administered all privacy, confidentiality, and ethics policies and protocols for the department’s employees.

Previously, the Chief Compliance Officer served as associate general counsel in the Office of the Governor of the State of Illinois and as lead attorney on issues involving health care, the Affordable Care Act, private and public insurance issues and health information technology. In this role, the Chief Compliance Officer managed a dozen state agency general counsels overseeing health care, insurance, human services, environmental, energy, commerce and housing legal issues. Further, the Chief Compliance Officer was responsible for a variety of complex policy and legislative initiatives including pension reform legal counsel, public-sector unions, and sensitive human services projects.

Before this, served as deputy general counsel of employee benefits for the Illinois Department of Central Management Services, and handled a range of benefits, insurance, pension, workers’ compensation, litigation and tax matters.

The Chief Compliance Officer was a legal health care consultant, and advised clients on HIPAA, private insurance accountability, specialty hospital regulation, health care reform, and regulatory filings and registrations, and has assisted political campaigns of candidates for federal and state offices, and was a member of the Obama for America National Health Policy Advisory Committee.

Head Pharmacist/General Manager

The company’s Head Pharmacist/Dispensary - General Manager is Doctor of Pharmacy, from Temple University, who has over 13 years of experience in the pharmacy industry serving as pharmacy tech, pharmacy manager and pharmacist; with practice expertise including:
• Medication therapy management.
• Community outreach.
• Retail management.
• Immunizations.
• Travel health.

**Academic Awards & Professional Certifications:**
- John R. Minehart Memorial Award for highest average all subjects.
- Eli Lilly Achievement Award for academic excellence.
- Merck & Company Award for highest pharmacy average.
- Mylan Pharmaceuticals Award for superior proficiency in the provision of drug info.
- PA Authorization to Administer Injectables.
- APhA “Pharmacy-Based Travel Health Services” training and certification.
- CDC “Yellow Fever Vaccine: Information for Health Care Professionals Advising Travelers” training.
- Outcomes and Mirixa MTM training.

The Head Pharmacist has spent the last 13 years providing exceptional patient care in a community setting and believes that a successful pharmacy practice meets the needs of patients by:
- Partnering with other healthcare providers,
- Ensuring optimal drug therapy, and
- Personalized care.

Fueled by patients demanding more options to manage their severe symptoms, the company’s Head Pharmacist is passionate about customizing therapy using medical marijuana.

The Head Pharmacist is **current employed by Weis Pharmacy** in Conshohocken, PA, and assisted in their acquisition of Roxy Drug by:
- Communicating with local physicians and health systems to ensure a successful transition,
- Retained 85% of new customer base after sale was complete,
- Increased prescription volume and sales by 25% within the first 6 months of employment and by 60% overall after the Roxy Drug acquisition, and
- Aided in the implementation of pharmacy-based medication therapy management program (MTM) to increase third-party reimbursement and improve healthcare quality scores in accordance with new federal healthcare regulations.

As the **pharmacy manager for Giant Pharmacy**, the Head Pharmacist:
- Oversaw the acquisition transition from Genuardi’s to Giant Pharmacy and coordinated the move from the old building to the newly constructed store, assisted with new permit application and regulatory compliance, and consulted on construction, design and workflow.
- Instituted Giant’s first pharmacist-run Travel Health clinic,
- Increased prescription volume by 45% at the new location in the first 2.5 years,
- Received zero chargebacks on third-party audits,
- Collaborated with in-store Registered Dietician on wellness events,
  Established Giant as a top-performing pharmacy for immunizations and innovation in pharmacy care, and
- Developed strong professional relationships with local physicians' and urgent care centers,
leading to increased referrals and new collaborative agreements.

Prior to the transition, the Head Pharmacist:

- Promoted pharmacy best practices by instituting the first pharmacy-based comprehensive immunization program in the Flourtown area,
- Established one of the first retail pharmacies to offer a full Travel Health service and immunization and other clinical services to the community through interaction with local physicians, customers, and senior centers.
- Assisted clients, such as Safeway, in organizing regional multi-store immunization campaigns,
- Organized and staffed in-store and offsite immunization clinics, and
- Hosted and organized in-store blood pressure, cholesterol, BMI, and diabetes screenings.

The Head Pharmacist also has 4 years of teaching experience as a National Faculty Member for APhA, a Pharmacy-based Immunization Delivery Certificate Training Program, from March 2008 to July 2012, and was responsible for training full-time pharmacists for Safeway’s Eastern Division to immunize, aided in the completion of all required APhA and state board paperwork for PA, NJ, DE, MD, VA, and D.C., and assisted the Eastern Division Regional Pharmacy Care Manager with state-specific compliance, including CPR training, initial license application and renewal notification, and OSHA Hepatitis B vaccination tracking.

## Operational Capacity

### Chief Executive Officer

The Chief Executive Officer works amongst industry groups, professionals and advocates towards further legitimizing the evolving legalization of medical marijuana. Beginning in 2009, the Chief Executive Officer independently owned and operated Live Green Consulting, which consulted medical marijuana entrepreneurs on the city and state regulations in Colorado, offering compliance solutions, licensing assistance, business concept development, and marketing/PR.

The company’s Chief Executive Officer is recognized as one of Colorado’s most successful female entrepreneurs in the medical and adult-use marijuana industries, and demonstrates a sound business acumen and leadership through advocating as a business owner, association leader, and a supporter of safe access and responsible regulation. The Chief Executive Officer’s success has been cited and or featured in major media outlets including but not limited to: Time Magazine, Bloomberg/Business Week, The New York Times, MSN Money, Entrepreneur Magazine, People Magazine, Inc., CNBC, ABC, CNN and many local media outlets.

Through the Chief Executive Officer’s dedication and hard work, they have developed strong relationships with Government Officials, State Legislators, the Colorado Department of Revenue, Colorado Department of Public Health and Environment, Colorado Department of Agriculture, City Officials and Council Representatives in Denver, Lakewood, Edgewater, Aurora and Boulder, Colorado, California, Ohio, Hawaii, Illinois, Maryland, Minnesota, and New York, and has established other
profound alliances on a national and international scale.

The Chief Executive Officer will use this experience to:
- Navigate the Medical Marijuana Program in Pennsylvania to ensure the company’s goals regarding operational excellences are met or exceeded
- Allow the company to become operational and remain operational once it has been awarded a permit.

Chief Operations Officer
The Chief Operations Officer maintains an establishment that achieves regulatory compliance under Food Safety & Inspection Service on a daily basis and has knowledge, skill and/or experience in the following areas:
- Development of food safety inspection enforcement action.
- Public notification procedures for voluntary recall of FSIS-inspected products.
- Experience in assessment of vulnerabilities in the food supply along with industry food defense guidance, in developing food defense plans.
- Continual food safety assessments, document management and reporting.
- Development and implementation of Hazard Analysis and Critical Control Point (HACCP) and FSIS' laboratory testing to help ensure the safety of food product for are two areas that help ensure the safety of the food supply
- Clear understanding of compliant label requirements for labeling, ingredients, and claims guidance and inspection methods to protect consumers from misbranded and economically adulterated products.
- Verified track record of working with raw material product to prevent them from becoming contaminated by biological, chemical, or physical hazards.

The company’s Chief Operations Officer has direct hands on experience in working with multiple projects with budgets ranging from $1.35 million to $52 million, all of which had to become operational within a target finish date for the client. These projects all required diversity and inclusion subcontract goals, affirmative action and equal employment policies, and other small and diverse business considerations in order to be considered for award.

By working closely with project stakeholders including Bayer/Medrad, University of Pittsburgh Chevron Science Center, PA Department of Corrections, Federal Bureau of Prisons, Latrobe Specialty Steel, Allegheny Technologies Incorporated, Heinz Hall, Benedum Center, ThyssenKrupp and more, the Chief Operations Officer has helped numerous local, regional, national, and international clients achieve project goals in a compressed timeframe.

The company’s Chief Operations Officer has experience in gathering and planning data and lead times with contractors, equipment vendors, procurement coordinators, customs inspection and permitted vehicle load transfers. The Chief Operations Officer has nearly 10 years of experience in

In an effort to demonstrate the company’s ability to become optional within the 6 month time period, the Chief Operations Officer will utilize the critical path methods in working with engineering and design companies, contractors, as well as equipment vendors, operating partners, strategic consultants, to determine a forward and backward pass to calculate the early start, early finish, late start, and late finish of the activities necessary to meet the objectives set forth in the company’s application responses.

Chief Financial Officer

The company’s Chief Financial Officer worked in the investment banking industry in New York for approximately 17 years, and possess the following Financial Industry Regulatory Authority (FINRA) series licenses:

- Series 63, Uniform Securities Agent State Law Examination.
- Series 7, General Securities Representative Examination.
- Series 24, General Securities Principal Examination.

As an Investment Banker, the Chief Financial Officer had no violations regarding any of his licenses he held or disciplinary action from FINRA.

Over the course of the last two years, the Chief Financial Officer has worked with companies in Colorado, Massachusetts, Illinois and Vermont guiding them through the regulatory burdens of financial compliance. The clients have ranged from newly awarded licenses for medical marijuana in Massachusetts, to established operators doing over $10mm in revenue per year in Colorado’s medical and adult-use markets, to facilitating the financial executive management for an Illinois medical marijuana operator and now currently employed by Champlain Valley Dispensary, Inc., Vermont’s largest medical marijuana organization, as the Director of Sales and New Business Development.

The Chief Financial Officer will bring these 19 years of investment banking and financial regulatory compliance to the company to ensure financial fitness and compliance for the organization. The Chief Financial Officer’s real-world medical marijuana experience navigating multiple transitional events in the medical marijuana and traditional investment markets will ensure growth and evolve the company into a prominent example of a compliant, successful and regulated medical marijuana organization within the Commonwealth of Pennsylvania.

The Chief Financial Officer holds his clients to the strictest of standards with regards to financial regulation and compliance within the adult-use and medical marijuana industries.

Medical marijuana projects the Chief Financial Officer has assisted with include:

- Patient’s Choice of Colorado / LivGreen – Denver, Colorado (Financial Advisor), November 2015
Pennsylvania Department of Health
Medical Marijuana Dispensary Permit Application

to present.
- Ipswich Pharmaceuticals – Ipswich, MA (Financial Advisor), February 2016 to present.
- Champlain Valley Dispensary, Inc. – Burlington, VT (Director of Sales and Business Development), September 2016 to present.
- ICC Holdings LLC d/b/a Revolution Enterprises – Downs Grover, IL (Chief Financial Officer), November 2016 to Present.
- Reilly’s HempVet – CBD enriched pet food (Financial Advisor), November 2016 to present.
- Vermont Cannabis Collaborative (VTCC), a non-profit organization formed to aid in the creation of a legislative foundation that will promote Common Sense Commerce for the medical marijuana movement, stimulating greater economic and social opportunity in Vermont. Volunteer time and knowledge to the VTCC in their writing of the attached report and served as Co-Leader for the Financial Services Committee, responsible for constructing the Financial Economic Model 2015.

Chief Security Officer
The Chief Security Officer has created security plans for multiple medical marijuana dispensary and cultivation center businesses that were awarded licenses in Illinois. In some of these decisions, two businesses received the same overall score but the applicant that received the highest grade in the security category was awarded the license, clearly underscoring the importance of a comprehensive security plan. To this point, the Chief Security Officer’s experience in successfully establishing and evaluating security plans will ensure the company can deter diversion while providing a safe and secure working environment and adhere to state and local law enforcement requirements and show clear evidence of compliance.

The Chief Security Officer will ensure the company’s security objectives are achieved through:
- Prevention-oriented planning,
- Continuous coordination with state and local government,
- Implementation of security best practices, and the
- Using the latest technology to deter, secure, monitor, and mitigate risk in all aspects of the operations.

Chief Compliance Officer
The Chief Compliance Officer will draw from five years of experience as a medical marijuana industry regulator and over 12 years as a healthcare regulatory attorney to ensure the company successfully executes its compliance plan by conducting onsite training and management of the compliance team whenever an investigation and/or response is warranted for suspected or verified violations. In addition, the Chief Compliance Officer will manage the company’s compliance program to ensure strict observance of all requirements for licensed medical marijuana businesses, focusing
on:

- Inventory management,
- Employee and patient safety,
- Production and distribution methods,
- Quality control and audit functions, and
- Ensuring the company is at all times a national model for the medical marijuana industry in terms of operational compliance.

The Chief Compliance Officer **will assist the company in the development of standard operating procedures** across a variety of functions, starting with education and training regarding relevant Commonwealth laws and regulations. Having served as a state’s lead regulator of a medical marijuana industry, the Chief Compliance Officer is vigilant about developing a standard of excellence that not only meets state laws and regulations, but substantially exceeds these expectations whenever possible. The Compliance Officer will create a culture of compliance that staff feels accountable and responsible for, before any potential violations occur.

The Chief Compliance Officer clearly understands the concerns and goals of patients, medical professionals and providers, hospitals and health systems, insurers, law enforcement officials and legislators, and **will draw on this knowledge to engage key stakeholders and develop effective public and private communications strategies** for the company and **ensure operational compliance within six months** of being issued a permit and thereafter.

**Head Pharmacist/General Manager**

During the Head Pharmacists’ tenure, Genuardi’s and Giant Pharmacies:

- Received zero chargebacks on third-party audits and achieved 100% compliance with internal pharmacy audits
- Increased prescription volume by an average of 50/week and pharmacy sales by an average of $2,000/week
- Increased community awareness for the pharmacy by meeting with physicians, nurses, and office managers
- Maintained inventory $10,000 below goal,
- Organized outdated product returns and transfer of unused stock to other network pharmacies to lower inventory,
- Supervised all inventories and third-party audits,
- Coordinated hiring and interviewing of support staff, as well as overstock database development.

The Head Pharmacist will utilize her 17 years of pharmacy, educational and managerial experience and transitional operations development and plan execution to:

- Ensure the company’s multiple dispensary locations are successfully launched, staffed and
Conclusion

Using the above assembled executive management team of medical marijuana, controlled substance, security, compliance, financial and operational experts and specialists, the company will successfully:
- Get each of its dispensary locations operational within six months from receiving a permit and
- Remain operational and compliant once business activities have commenced, while preventing diversion and complying with all applicable rules and regulations of the Commonwealth.

SECTION 20 – CURRENT OFFICERS

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

| Name and Residential Address |
| First Name: [Redacted] | Middle Name: [Redacted] | Last Name: [Redacted] | Suffix: |
| Occupation: Business Owner and Founder | Title in the applicant’s business: Chief Operating Officer |
| Also known as: N/A | Date of birth: [Redacted] |
| Address Line 1: [Redacted] | Address Line 2: |
| Address Line 3: | City: [Redacted] | State: PA | Zip Code: [Redacted] |
| Phone: [Redacted] | Fax: N/A | Email: [Redacted] |

| Name and Residential Address |
| First Name: [Redacted] | Middle Name: [Redacted] | Last Name: [Redacted] | Suffix: |
| Occupation: Board Certified Orthopaedic Surgeon | Title in the applicant’s business: Financial Backer / Medical Advisory Board Member |
| Also known as: [Redacted] | Date of birth: [Redacted] |
| Address Line 1: [Redacted] | Address Line 2: |
| Address Line 3: | City: [Redacted] | State: PA | Zip Code: [Redacted] |
| Phone: [Redacted] | Fax: N/A | Email: [Redacted] |

| Name and Residential Address |
| First Name: [Redacted] | Middle Name: [Redacted] | Last Name: [Redacted] | Suffix: |
| Occupation: Business Owner and Philanthropist | Title in the applicant’s business: Financial Backer |
| Also known as: N/A | Date of birth: [Redacted] |
| Address Line 1: [Redacted] | Address Line 2: |
| Address Line 3: | City: [Redacted] | State: PA | Zip Code: [Redacted] |
| Phone: [Redacted] | Fax: N/A | Email: [Redacted] |

| Name and Residential Address |
| First Name: [Redacted] | Middle Name: [Redacted] | Last Name: [Redacted] | Suffix: |
| Occupation: Business Owner | Title in the applicant’s business: Financial Backer |
| Also known as: N/A | Date of birth: [Redacted] |
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Medical Marijuana Dispensary Permit Application

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

**SECTION 21 – OWNERSHIP**

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

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

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

COMPLETE THE APPROPRIATE SECTION(S) BELOW:

**A. FOR C-CORPORATIONS, S-CORPORATIONS, LLCs AND LLLCs**
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<tr>
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</tr>
<tr>
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<td><strong>Terms, conditions, rights and privileges:</strong> DOH REDACTED</td>
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**Occupation:** Business Owner  
**Title in the applicant’s business:** Financial Backer  
**Also known as:** [Redacted]  
**Date of Birth:** [Redacted]  
**Address Line 1:** [Redacted]  
**Address Line 2:** [Redacted]  
**Address Line 3:** [Redacted]  
**City:** [Redacted]  
**State:** [Redacted]  
**Zip Code:** [Redacted]  
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**Email:** [Redacted]  

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- **Number of shares held:** [Redacted]  
- **Date Acquired:** [Redacted]  
- **Percentage of outstanding voting stock:** [Redacted]  

**Terms, conditions, rights and privileges:**  
**DOH REDACTED**

### Name and Residential Address

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**Occupation:** Executive Director and CEO  
**Title in the applicant’s business:** Financial Backer  
**Also known as:** [Redacted]  
**Date of Birth:** [Redacted]  
**Address Line 1:** [Redacted]  
**Address Line 2:** [Redacted]  
**Address Line 3:** [Redacted]  
**City:** [Redacted]  
**State:** [Redacted]  
**Zip Code:** [Redacted]  
**Phone:** [Redacted]  
**Fax:** N/A  
**Email:** [Redacted]  

- **Stock type or class:** [Redacted]  
- **Number of shares held:** [Redacted]  
- **Date Acquired:** [Redacted]  
- **Percentage of outstanding voting stock:** [Redacted]  

**Terms, conditions, rights and privileges:**  
**DOH REDACTED**

### Name and Residential Address

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**Occupation:** Neurosurgeon  
**Title in the applicant’s business:** Financial Backer / Medical Advisory Board Member  
**Also known as:** [Redacted]  
**Date of Birth:** [Redacted]  
**Address Line 1:** [Redacted]  
**Address Line 2:** [Redacted]  
**Address Line 3:** [Redacted]  
**City:** [Redacted]  
**State:** [Redacted]  
**Zip Code:** [Redacted]  
**Phone:** [Redacted]  
**Fax:** N/A  
**Email:** [Redacted]  

- **Stock type or class:** [Redacted]  
- **Number of shares held:** [Redacted]  
- **Date Acquired:** [Redacted]  
- **Percentage of outstanding voting stock:** [Redacted]  

**Terms, conditions, rights and privileges:**  
**DOH REDACTED**
Pennsylvania Department of Health
Medical Marijuana Dispensary Permit Application

Name and Residential Address
First Name: 	Middle Name: 	Last Name: 	Suffix:

Occupation: 
Title in the applicant’s business: 

Also known as: 
Date of birth: MM/DD/YYYY

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

Phone: 
Fax: 
Email: 

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

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

B. FOR PARTNERSHIPS AND LLPS

Name and Residential Address
First Name: 	Middle Name: 	Last Name: 	Suffix:

Occupation: 
Title in the applicant’s business: 

Also known as: 
Date of birth: MM/DD/YYYY

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

Phone: 
Fax: 
Email: 

Partner Type: 
□ General/Full Partner 
□ Limited Partner 
□ Dormant/Silent Partner 
□ Other:
Percentage of ownership: Partnership participation from: Description of participation in operation of the applicant:

Name and Residential Address
First Name: 	Middle Name: 	Last Name: 	Suffix:

Occupation: 
Title in the applicant’s business: 

Also known as: 
Date of birth: MM/DD/YYYY

Address Line 1: 
Address Line 2: 
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Partner Type: 
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□ Limited Partner 
□ Dormant/Silent Partner 
□ Other:
Percentage of ownership: Partnership participation from: Description of participation in operation of the applicant:
Pennsylvania Department of Health
Medical Marijuana Dispensary Permit Application

- **Limited Partner**
- **Dormant/Silent Partner**
- **Other:**

**Ownership:** MM/DD/YYYY

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**Name and Residential Address**
# Pennsylvania Department of Health

## Medical Marijuana Dispensary Permit Application

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### Pennsylvania Department of Health

**Medical Marijuana Dispensary Permit Application**

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| □ General/Full Partner | □ Limited Partner | □ Dormant/Silent Partner |
| □ Other: | | Description of participation in operation of the applicant: |

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

### C. OTHER PERSONS HOLDING AN INTEREST IN THE PROPOSED SITE OR FACILITY

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

### Name and Residential Address

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

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### Name and Residential Address

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Pennsylvania Department of Health
Medical Marijuana Dispensary Permit Application

Address Line 3: ___________________________ City: ___________________________ State: _______ Zip Code: _______

Phone: ___________________________ Fax: ___________________________ Email: ___________________________

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

Name and Residential Address

First Name: ___________________________ Middle Name: ___________________________ Last Name: ___________________________ Suffix:

Occupation: ___________________________ Title in the applicant’s business: ___________________________

Also known as: ___________________________ Date of birth: _______ / _______ / _______

Address Line 1: ___________________________ Address Line 2: ___________________________

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

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First Name: ___________________________ Middle Name: ___________________________ Last Name: ___________________________ Suffix:

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Phone: ___________________________ Fax: ___________________________ Email: ___________________________

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

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

SECTION 22 – CAPITAL REQUIREMENTS

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:

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

SECTION 23 – COMMUNITY IMPACT

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

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

Community Impact Summary

This response will summarize the company and its efforts to ensure its dispensary operations have a positive impact on the community where its facilities are proposed to be located, and will specifically address:

- Company-wide community impact efforts.
- Education, training, advocacy, research.
- Economic impact.
- Good Neighbor Policy.
- Risk mitigation.
- Strategic focus areas:
  - Environmental preservation.
  - Drug abuse and addiction prevention.
- Location specific impact:
  - Clinical impact.
Community support opportunities.

- Economic impact.

The company’s mission is to advance health and wellness through targeted medical marijuana therapies. The company’s goal is to improve health outcomes in its communities by carrying out the treatment access and patient care intentions set forth in Pennsylvania’s Medical Marijuana Act (“Act 16”) and 28 Pa. Code 1161, the Pennsylvania Department of Health (“DOH”) Temporary Regulations - Dispensaries.

The concept of the company came about when a Pennsylvania entrepreneur witnessed a little girl having a grand mal seizure in a public place. Knowing that medical marijuana could improve and even save the little girl’s life drove the entrepreneur to respond to his community’s need for this innovative treatment. He paired up with the little girl’s mother to develop a plan for a business that would make medical marijuana accessible to their fellow community members. Together, they founded the company and worked closely with Pennsylvania leaders to advocate for the inclusion of a “safe harbor” provision in Act 16. The safe harbor provision became §2106 of Act 16, allowing for the legal procurement of medical marijuana from other states by parents of eligible children.

About Us

The founders’ advocacy work gave them opportunities to recruit leading professionals in the medical marijuana industry to help build and operate the company. The company’s leadership team will infuse their expertise into Pennsylvania’s Medical Marijuana Program through the company’s operations and interactions with its communities.

The company’s Chief Executive Officer (“CEO”) grew a Colorado medical marijuana company to a staff of 75, serves on the executive board of Colorado-based Marijuana Industry Group, is a founding board
member of the Council for Responsible Cannabis Regulation, and is a funding founder of Women Grow. The CEO served on the Colorado State Licensing Authority’s A64 (policy for cannabis) Working Group as a member and stakeholder.

The company’s Chief Compliance Officer (“CCO”) manages the Cannabis Industry Practice Group for a Chicago-based law firm. The CCO was appointed by the Governor to be the first statewide project coordinator for the State of Illinois Medical Cannabis Pilot Program. The CCO served as associate general counsel for the Illinois Office of the Governor and served as general counsel for the Illinois Department of Public Health, advising on licensure, maternal and child health, mental health and disability, and food safety among other issues.

The Chief Security Officer (“CSO”) was a special agent for the United States Secret Service for 21 years and served the Skokie (Illinois) Police Department and the National Basketball Association. The CSO lead the design and creation of comprehensive security standards to mitigate risk and liaised with state regulators and local officials for Northshore Alternative Therapy Medical Cannabis (Illinois).

The Chief Science Officer (“CSO”) was a member of the team that facilitated accessibility to the first cannabinoid dietary supplement to be sold legally in the United States. The CSO has experience with standardizing cultivation procedures for the incorporation of Good Agricultural and Collection Practices and has created and implemented standard operating procedures for the manufacture of botanical drug substances in compliance with Good Manufacturing Practice. The CSO is an associate partner with the Indian Industrial Hemp Association and the former chairperson of the Hemp Industry Association’s Cannabinoid Committee. The CSO is a founder and currently serves as chief operating officer at Applied Botanical Sciences, a cannabinoid nutraceutical company.

The company’s Chief Financial Officer (“CFO”) has 19 years of experience in investment banking and financial regulatory compliance. The CFO consulted with Medallion Financial Corporation to develop a medical marijuana business plan and execute investment strategies in the medical marijuana industry across the United States. The CFO has worked with medical marijuana organizations in Colorado, Massachusetts, Illinois, and Vermont. The CFO currently serves as director of sales and new business development for Champlain Valley Dispensary, Inc., Vermont’s largest medical marijuana organization.

The company’s Head Pharmacist and General Manager (“GM”) has worked for 13 years as a community retail pharmacist and corporate pharmacy manager. The GM has a record of 100% compliance with third-party audits and has expertise at managing and training employees on medication therapy management programs for chronic disease. The GM is cherished by community members as a healthcare advocate and community leader.

Advocacy through Research

The company will utilize research as a means of advocacy. The company is pursuing research partnerships with The Sampson Foundation, a Pittsburgh-area family foundation. Partnerships may include supporting the foundation’s active study with the University of Pittsburgh Cancer Institute.
examining the effectiveness of mind-body interventions for esophageal cancer patients and launching new research on health outcomes that occur secondary to relief of symptoms from the serious medical conditions listed in Act 16 (e.g., the ability to participate in school sports or exercise programs secondary to reduced seizure activity). This partnership will aim to assist Pennsylvania in addressing cancer and integration of healthcare and behavioral/mental healthcare, two objectives indicated in the Pennsylvania State Health Improvement Plan 2015-2020 (“SHIP”).

The company will leverage its quantitative and qualitative data to publish results addressing research questions, such as the following:

- What outcomes does each medical marijuana product produce for each of the serious medical conditions covered under Act 16?
- What variables (e.g., cost, patient demographics) impact patient compliance on medical marijuana treatment regimens?
- Which medical marijuana products are most/least preferred by patients?
- What is the frequency of prescribing medical marijuana based on physician specialty?
- What crime, utility, and economic impact does the company have on the community?
- What are the community’s additional healthcare needs?

Advocacy through Awareness and Education

The company will strategically collaborate on ongoing education and training and advocacy campaigns and events with the Pennsylvania Medical Cannabis Society (“PAMCS”), a nonprofit organization. PAMCS, its leadership, staff, volunteers, and members work toward a vision of a diverse and sustainable medical marijuana industry in Pennsylvania known for its exemplary standards, extraordinary products, and compassionate practices.

Established in 2015, PAMCS has been involved in more than 35 events across the state, and its messages have reached more than 10,000 people in person, via the web, and through more than 30 press appearances. These messages are all related to advancing medical marijuana policy, science, education, and ethics and, while they speak to a broad audience, are presented in a professional tone and succeed at engaging public officials, renowned healthcare industry leaders, and celebrated entrepreneurs and investors.

Good Neighbor Policy

The company’s Good Neighbor Policy (“GNP”) is a tool designed to establish expectations of the company for the community. The GNP will facilitate communication and define the company’s commitment to courteous and transparent business operations. Through the GNP, the company aims to optimize opportunities to make a positive impact on the community and minimize any possible negative impacts on the community. The following provisions of the GNP are not specific to allow for creativity and flexibility as issues arise.
• The company will establish and maintain community member awareness of its identity, location, contact information, and mission through door knocking, telephone, and direct and electronic mail campaigns.
• The company will pursue opportunities to present on topics related to its mission in all-size group settings in its community.
• The company will routinely survey its fellow community members to assess its impact. If needed, the company will adjust operations based on survey results.
• The company will be compliant with all local and state laws and ordinances.
• The company will establish and maintain an appropriate level of visibility in all its business practices.
• The company will share its physical assets and human resources to assist its neighbors in times of emergency, if by doing so, it will not violate any local and state laws and ordinances.
• The company will engage its community in carrying out its mission and addressing its strategic focus areas.

**Economic Impact**

The company will have an economic impact on its communities by replacing lost jobs, adding new jobs, and retaining locally-trained talent.

The company aims to have a long-term impact on the regional economy through its multidisciplinary internships for students at Manchester Bidwell, a Pittsburgh-based technical school offering healthcare and business programs. This educational effort will also help build and provide a talented pool of future medical marijuana professionals.

The company’s positive economic performance will result in increased gross receipts, business privilege, income, real estate, and corporate taxes paid to the Pennsylvania Medical Marijuana Fund and other tax-funded programs.

**Risk Mitigation**

As defined in Act 16, 5% of the company’s gross receipts taxes paid into the Pennsylvania Medical Marijuana Fund will go toward local police departments. The company will meet the demands of 28 Pa. Code Chapter §1161.31 Security and Surveillance, the DOH Temporary Regulations - Dispensaries.

The company will make its security assets, including surveillance recordings, readily available to law enforcement agencies for use in investigations.

**Strategic Focus Areas**

Environmental Preservation, and Drug Abuse and Addiction Prevention, are the company’s strategic focus areas for community impact. These two concepts will be considered in every major strategic plan,
The company’s Employee Volunteer Program (“EVP”) will be the platform for employee engagement in strategic focus areas for community impact. Through the EVP, company leadership will encourage all employees to use at least two and as many as four paid workdays per year for volunteer initiatives. To help employees satisfy the EVP requirement, the company will offer organized volunteer programs with select partner organizations and employees will be able to nominate and elect organizations that are meaningful to them.

**Environmental Preservation**

The company will implement sustainable design strategies in its facilities to keep the company’s carbon footprint low, minimize burden on local utility resources, create comfortable work environments for employees, and set an example of environmental consciousness for community businesses. Intended design components include sun shading, energy efficient windows, solar panels, and geothermal heating/cooling.

The company will comply with chapters §1161.34 of the Pa. Code 28 regarding sanitation and safety in a facility. The company’s sanitary and responsible waste management, pest control, cleaning, and cleaning product storage practices will result in high quality products and minimal impact on the local environment.

The company will comply with or surpass municipality-directed voluntary recycling efforts by engaging a private recycling firm to collect, separate, and recycle industrial and household level waste; limit the purchasing and use of non-recycled products; and, minimize operational waste. The company will comply with local execution of Pennsylvania’s Municipal Waste Planning, Recycling and Waste Reduction Act by measuring and demonstrating the positive outcomes of its above-and-beyond recycling efforts.

As part of its EVP, the company’s leadership will collaborate with Keep Pennsylvania Beautiful on local illegal dump cleanup projects. Past Keep Pennsylvania Beautiful surveys identified the following:

- 2009 Westmoreland County: 310 illegal dumpsites
- 2007 Butler County: 217 illegal dumpsites
- 2005 Allegheny County: 202 illegal dumpsites

**Drug Abuse and Addiction Prevention**

As defined in Act 16, 10% of the company’s gross receipts taxes paid into the Pennsylvania Medical Marijuana Fund will go toward drug abuse prevention and counseling and treatment services through the Department of Drug and Alcohol Programs.

The GM will train the company’s staff on identifying, based on signs and symptoms, and preventing drug abuse. If dispensary staff suspect that a patient is abusing drugs, the GM or other clinician will provide the patient with a local resource guide, including providers and services that the patient can
pursue without further company involvement.

According to the CDC, Pennsylvania had the highest number of drug overdose deaths in the country in 2015. The state has led a variety of efforts to address this problem, including addressing it in the Pennsylvania State Health Improvement Plan 2015-2020 (“SHIP”). Objective 1.1 of the SHIP is to “increase access to quality mental health and substance use services for all Pennsylvania residents by increasing the percent of adults 18 or older with any mental health illness who received treatment or counseling from 46.7% in 2009-2013 to 51% by December 2020.”

To help Pennsylvania achieve meet Objective 1.1 of the SHIP, the company’s leadership team will pursue awareness, education, and advocacy projects with several departments and organizations, including, but not limited to:

- Pennsylvania Department of Drug and Alcohol Programs
- Pennsylvania Department of Human Services
- Single County Authorities on Drugs and Alcohol
- Drug and Alcohol Service Providers Organization of Pennsylvania
- Pennsylvania Recovery Organizations Alliance
- Pennsylvania Psychiatric Society
- Rehabilitation and Community Providers Association
- Pennsylvania Mental Health Consumers Association
- Pennsylvania Mental Health Association
- Pennsylvania Psychiatric Leadership Council
- Pennsylvania Association of Community Health Centers
- Pennsylvania Office of the Attorney General
- Pennsylvania National Guard Counterdrug Joint Task Force
- Pennsylvania Medical Society
- Pennsylvania Pharmacists Association
- State Board of Medicine
- State Board of Nursing
- State Board of Dentistry
- Pennsylvania Department of State
- Pennsylvania Department of Aging
- Board of Pharmacy

A John’s Hopkins study published in 2014 concluded that “medical marijuana laws are associated with significantly lower state-level opioid overdose mortality rates,” based on data from across the United States between 1999-2010 (Bachuber, 2014). The company’s business operations will complement Pennsylvania’s opioid epidemic mitigation efforts by providing targeted medical marijuana therapies that can serve as alternative treatments to opioids for severe chronic and/or intractable pain of neuropathic origin or intractable pain in which conventional therapeutic intervention is ineffective.
If approved by the state, all the company's pharmacist-staffed locations will feature and naloxone dispensing and training to help carry out these pharmacy-level strategies that are currently being directed at the state level.

**Location-Specific Impact Initiatives**

The company will have dispensary locations in Greensburg, Westmoreland County; Cranberry Township, Butler County; and the Lawrenceville section of Pittsburgh, Allegheny County. Based on location, the company has unique clinical impact, community support, and economic impact opportunities.

**Greensburg**

The company’s flagship dispensary location is in Greensburg, Pennsylvania, the county seat of Westmoreland County.

**CLINICAL IMPACT**

The “Age 65 and Above” category is the most represented in Greensburg and is expected to grow from 19.65% in 2016 to 22.1% in 2021, compared to 16.3% in Pennsylvania in 2015 [Pennsylvania Department of Community & Economic Development (“PADCED”)]. In addition to providing therapies for all Act 16 serious medical conditions, the company’s Greensburg location will tailor therapies, provider engagement initiatives, and operations to address the unique needs of this young population and their parents/caregivers.

Increased age is the number one risk factor for nearly one third (5/17) of the serious medical conditions covered under Act 16. The company’s Greensburg location staff will prioritize providing targeted therapies for cancer, ALS, Parkinson’s disease, glaucoma, and Crohn’s disease [28 Pa. Code §1141.21 Definitions under Serious Medical Condition (i)-(xvii)] in senior-friendly packaging. Based on available prevalence data, there are currently nearly 50,000 community residents suffering with these conditions. See Chart A for prevalence data (as reported by the CDC and/or PA Census) on these and the other serious medical conditions covered under Act 16. Note that the total number of potential current patient lives that could be impacted by the company almost immediately is 90,653.

**Patient Population – Greensburg Dispensary Location**

<table>
<thead>
<tr>
<th>Condition</th>
<th>#Greensburg (+ 20-mile radius) Patients</th>
</tr>
</thead>
<tbody>
<tr>
<td>Autism</td>
<td>1,352 (Westmoreland County)</td>
</tr>
<tr>
<td>ALS</td>
<td>No info</td>
</tr>
<tr>
<td>Cancer</td>
<td>5,780</td>
</tr>
<tr>
<td>Chronic/Intractable Pain</td>
<td>No info</td>
</tr>
<tr>
<td>Epilepsy/Seizures</td>
<td>4,855</td>
</tr>
<tr>
<td>Glaucoma</td>
<td>8,092</td>
</tr>
</tbody>
</table>
Pennsylvania Department of Health
Medical Marijuana Dispensary Permit Application

<table>
<thead>
<tr>
<th>Condition</th>
<th>Count</th>
</tr>
</thead>
<tbody>
<tr>
<td>HIV/AIDS</td>
<td>1,445</td>
</tr>
<tr>
<td>Huntington’s</td>
<td>1,561</td>
</tr>
<tr>
<td>IBS/Crohn’s</td>
<td>30,634</td>
</tr>
<tr>
<td>MS</td>
<td>694</td>
</tr>
<tr>
<td>Neuropathic Pain</td>
<td>12,311</td>
</tr>
<tr>
<td>Parkinson’s</td>
<td>4,566</td>
</tr>
<tr>
<td>PTSD</td>
<td>6,589</td>
</tr>
<tr>
<td>Sickle Cell</td>
<td>12,138</td>
</tr>
<tr>
<td>Spinal cord</td>
<td>636</td>
</tr>
<tr>
<td>TOTAL</td>
<td>90,653</td>
</tr>
</tbody>
</table>

COMMUNITY SUPPORT OPPORTUNITIES

The company will continuously align its community impact goals with the priorities of Westmoreland County. The company will support Westmoreland County in providing services and opportunities to older adults through the Westmoreland County Area Agency on Aging. The company will offer to host medical marijuana education and training sessions at Westmoreland County’s 13 Centers for Active Adults, provide speakers and materials for professional training programs offered through the Senior Community Service Employment Program, participate in care coordination, and support elderly abuse awareness initiatives.

Greensburg has a substantial and growing healthcare industry. Excela Health - Excela Westmoreland Hospital, Westmoreland County’s third-largest employer [Pennsylvania Department of Community & Economic Development (“PADCED”)] is in Greensburg. The combined total of Health and Medical Services plus Hospitals represents the largest percentage of businesses by establishment type in Greensburg (17.2%, n=198). These two categories combined also represent the second highest total employees by establishment type (n=3,077/18.3%) according to the (PADCED). The company’s Greensburg location will optimize the opportunity for inter-specialty provider collaboration and provide ease of access for local and nearby Westmoreland and surrounding county residents that already utilize health and medical services in Greensburg.

The company’s Greensburg location is on the Westmoreland County Transit Authority (“WCTA”) bus line, 340 feet east of the stop for the Greensburg-Latrobe Shopper #9 and #9S. GO Westmoreland (“GO”) provides transportation services for residents of Westmoreland County requiring special assistance because of limited mobility or 65+ years of age. Often the fare is free or discounted for eligible riders compared to regular bus service fare rates. Residents must register with GO to confirm eligibility for special transportation services. Once registered, residents may ride for free on fixed-route WCTA public bus services to gain access to the company’s Greensburg Dispensary. WCTA reported the GO Westmoreland trip total for senior and disabled ridership as 75,091 in 2015-16, which is a 16% increase from the previous year.

In Greensburg in 2016, the clear majority (52.6%) of crimes were property offenses, followed by assaults (21%). To assist its surrounding community in crime prevention and reduction initiatives,
leadership and staff will participate in the Greensburg Neighborhood Watch and engage the Greensburg Police Department and local business security operations in information sharing and safety education initiatives.

**ECONOMIC IMPACT**
The company’s Greensburg location will be the first commercial use property on a block within the Greensburg’s Gateway Overlay District that permits the conversion of adjacent residential houses into a commercial use. The conversion will increase the assessed value of the structure and nearby property values. The company’s Greensburg physical location will impact the community in two areas. First, the Westmoreland County Land Bank collects 50% of the total real estate taxes generated by the company for five years. A rough tax calculation is $3,200 per year ($16,000 in total). The Land Bank will use this revenue to remove blight in another part of Greensburg. Second, the dispensary property and structure will be Local Economic Revitalization Tax Assistance (LERTA) eligible. Greensburg’s program has the developer paying back into a community fund 75% of the abated real estate tax each year for 10 years. A rough calculation is $41,700 total paid to the Greensburg Fund by the company in abated real estate taxes. The Greensburg Fund Committee then allocates these funds to remove blight and create jobs in Greensburg. The local incentive to the developer is the retention of 25% of the abated real estate taxes each year for 10 years (or $16,000).

The company will impact its communities by providing increasing job opportunities as the business grows. The company’s employment impact is especially important in Greensburg, which is projected to see an increase in unemployment from 6.28% in 2016 to 6.33% in 2021 (PADCED). Furthermore, Westmoreland County had a higher unemployment rate (5.8%) compared to that of the state (5.6%) in 2016 and a higher rate of decrease in online job postings from 2015 to 2016 (20.7%) compared to that of the state (10.7%) (PADCED).

**Lawrenceville**
The company has a secondary dispensary location in the Lawrenceville section of Pittsburgh, Pennsylvania.

**CLINICAL IMPACT**
Lawrenceville is a gentrifying urban neighborhood in Pennsylvania’s second largest city. The population of Lawrenceville is small; however, the Allegheny County Port Authority provides ample public transportation to facilitate the development of patient/caregiver base as diverse in health status, age, ethnicity, and socioeconomic status as the City of Pittsburgh. The company’s Lawrenceville location will have diverse offerings in therapies, patient/caregiver and provider engagement initiatives, and operations to address the needs of its diverse, urban population. The company will aim to accommodate the diverse needs and priorities of the community as identified and directed by local medical providers.

See Chart B for prevalence data (as reported by the CDC and/or PA Census) on the other medical
conditions covered under Act 16 in and within 20 miles of Lawrenceville. The total number of potential current patient lives that could be directly impacted by the company almost immediately is 92,556.

### Patient Population – Lawrenceville Dispensary Location

<table>
<thead>
<tr>
<th>Condition</th>
<th>Lawrenceville #Patients</th>
</tr>
</thead>
<tbody>
<tr>
<td>Autism</td>
<td>4,894 (Allegheny County)</td>
</tr>
<tr>
<td>Cancer</td>
<td>5,674</td>
</tr>
<tr>
<td>Epilepsy</td>
<td>4,766</td>
</tr>
<tr>
<td>Glaucoma</td>
<td>7,944</td>
</tr>
<tr>
<td>HIV</td>
<td>1,418</td>
</tr>
<tr>
<td>Huntington’s</td>
<td>1,532</td>
</tr>
<tr>
<td>IBS</td>
<td>30,072</td>
</tr>
<tr>
<td>MS</td>
<td>681</td>
</tr>
<tr>
<td>Neuropathic Pain</td>
<td>12,085</td>
</tr>
<tr>
<td>Parkinson’s</td>
<td>4,482</td>
</tr>
<tr>
<td>PTSD</td>
<td>6,468</td>
</tr>
<tr>
<td>Sickle Cell</td>
<td>11,915</td>
</tr>
<tr>
<td>Spinal cord</td>
<td>625</td>
</tr>
<tr>
<td><strong>TOTAL</strong></td>
<td><strong>92,556</strong></td>
</tr>
</tbody>
</table>

### Community Support Opportunities

The company will continuously align its community impact goals with the priorities of the Allegheny County Health Department (“ACHD”) in support of its community impact initiatives. Currently, a top priority of the ACHD is to decrease the number of opiate-related overdose deaths, which have exceeded 400 per year for the last two years (OverdoseFreePA). The company will leverage the opportunity to reduce the prescribing of opiates to treat severe chronic and/or intractable pain of neuropathic origin or intractable pain in which conventional therapeutic intervention is ineffective [28 Pa. Code §1141.21 Definitions under Serious Medical Condition (i)-(xvii)] by providing targeting medical marijuana therapies.

The company will work support the Allegheny County Overdose Prevention Coalition and Prevention Point Pittsburgh through its EVP. The company will provide material and speakers for Allegheny County’s many community and school-based education and professional training programs.

University of Pittsburgh Medical Center (“UPMC”), the region’s largest healthcare organization (41% market share across 29 counties) has a strong presence in Lawrenceville. UPMC St. Margaret Lawrenceville is a full-service neighborhood family practice for community residents of all ages. Children’s Hospital of Pittsburgh of UPMC (“CHP of UPMC”) in Lawrenceville is nationally ranked in the top 10 by U.S. News and World Report for seven years in a row. These organizations are the county’s 17th and 43rd largest employers, respectively (PA Department of Labor and Industry). The company’s Lawrenceville location will optimize the opportunity for inter-specialty provider collaboration and provide ease of access for local and nearby residents that already utilize health and medical services in Greensburg.
The company’s Lawrenceville location will operate from a multi-unit two-story facility shared by PAMCS and Comprehensive Clinical Consultants (“C3”). The founder and director of Comprehensive Clinical Consultants submitted a letter of support citing that its member physicians and scientists are ambitious to be work with the company, because of “their long-term goals of improving access to care, quality of care, patient knowledge, patient autonomy, and community health at large.” The synergies between the company and its co-residents will benefit the community through resulting healthcare delivery innovations and comprehensive education and advocacy efforts.

In 2013, Port Authority of Allegheny County (“PAT”) was ranked the 26th-largest public transit agency in the United States with more than 63,000 passenger trips. PAT provides public transportation by bus, light rail, and funicular. Promoting PAT through the company’s various web platforms will encourage increased use, thereby mitigating potential losses associated with transportation infrastructure wear and tear and relieving the municipalities, counties, and the state of some of the operating costs of this important service.

Lawrenceville is included in Pittsburgh Police Zone 2. The 2014 report from Pittsburgh’s Bureau of Police demonstrated that arrests in Zone 2 made up for more than 30% of all arrests in Pittsburgh. Most of these arrests occurred in the Central Business District (64), which is between three-four miles from Lawrenceville. The overwhelming majority of crimes are property offenses (75%) according to the most recent (2014) report from Pittsburgh’s Bureau of Police. To assist its surrounding community in crime prevention and reduction initiatives, the company’s leadership and staff will participate in Lawrenceville United’s Local Block Watches and engage Zone 2 of the Pittsburgh Bureau of Police and local business security operations in information sharing and safety education initiatives.

**ECONOMIC IMPACT**

The company’s Lawrenceville location property development will include building renovations, surface parking, and landscape features that will result in a net increase in taxable market value of $780,200. The currently vacant building and blighted property is assessed at $179,200. With the company’s development, this assessment is projected to increase to $959,400. This increased assessment will result in an increase in real estate taxes from $4,100 to $21,951 annually. This total represents $9,440 to the school district, $4,538 to the county, $7,733 to the city, and $45 to the Carnegie Library each year.

The company will add jobs to the Lawrenceville section of Pittsburgh, which aligns with the City’s goal of investing in Lawrenceville development as part of its “Investing in the Edge” initiative that is outlined in the Municipalities Financial Recovery Act published in 2014. As part of this investment, Pittsburgh will invest in strategic development initiatives that capitalize on the area’s gentrification trend, including adding affordable housing and a bike infrastructure and integrating storm water management techniques.

**Cranberry Township**

The company has a tertiary dispensary in Cranberry Township, Butler County, Pennsylvania.
CLINICAL IMPACT

Children ages 0-17 make up the largest age group in Butler County (2.2%) (PADCED). According to the CDC, in children aged 0-17, about 1 in 68 have autism and about 1 in 100 have epilepsy, another serious medical condition covered under Act 16. In 2011, Butler County had 707 individuals with autism, a serious medical condition covered under Act 16, receiving services. Nearby Mercer, Warren, Clearfield, and Crawford counties had the highest prevalence of autism in the state.

In addition to providing therapies for all Act 16 serious medical conditions, the company’s Cranberry location will tailor therapies, provider engagement initiatives, and operations to address the unique needs of this young population and their parents/caregivers. The company will aim to work closely with pediatric medical practitioners, including CCP Bellevue Pediatrics Associates - Cranberry, a division of CHP of UPMC, and parents on education and training initiatives. All the company’s medical marijuana product packages will be child resistant and clearly warn to keep them out of the reach of children.

See Chart C for prevalence data (as reported by the CDC and/or PA Census) on autism, epilepsy, and the other serious medical conditions covered under Act 16 in and within 20 miles of Cranberry. The total number of potential current patient lives that could be impacted by the company almost immediately is 50,286.

Patient Population – Cranberry Dispensary Location

<table>
<thead>
<tr>
<th>Condition</th>
<th>Cranberry #Patients</th>
</tr>
</thead>
<tbody>
<tr>
<td>Autism</td>
<td>707 (Butler County)</td>
</tr>
<tr>
<td>Cancer</td>
<td>3,250</td>
</tr>
<tr>
<td>Epilepsy</td>
<td>2,730</td>
</tr>
<tr>
<td>Glaucoma</td>
<td>4,550</td>
</tr>
<tr>
<td>HIV</td>
<td>813</td>
</tr>
<tr>
<td>Huntington’s</td>
<td>878</td>
</tr>
<tr>
<td>IBS</td>
<td>16,589</td>
</tr>
<tr>
<td>MS</td>
<td>390</td>
</tr>
<tr>
<td>Neuropathic Pain</td>
<td>6,923</td>
</tr>
<tr>
<td>Parkinson’s</td>
<td>2,568</td>
</tr>
<tr>
<td>PTSD</td>
<td>3,705</td>
</tr>
<tr>
<td>Sickle Cell</td>
<td>6,825</td>
</tr>
<tr>
<td>Spinal cord</td>
<td>358</td>
</tr>
<tr>
<td>TOTAL</td>
<td>50,286</td>
</tr>
</tbody>
</table>

COMMUNITY SUPPORT OPPORTUNITIES

To complement its patient care operations, the company will engage with its community through novel and existing programs that support children with autism and epilepsy. The company will provide volunteers for the Butler County Annual Sensory Friendly Santa Visit; The ARC of Butler County’s Friday Night Parties, Companions program, local health fair information booths, and committees; and local activities for Autism Connection of Pennsylvania and the Epilepsy Foundation of Western PA. The
company will also aim to support The ARC of Butler County by utilizing services, such as mailroom for outreach projects and fabrication for box assembly, offered by PARC Productions, the organization’s commercial revenue source.

In Cranberry in 2016, 98.5% of crimes were property offenses, and the remaining 1.5% were violent crimes (Pennsylvania Uniform Crime-Reporting System). To assist its surrounding community in crime prevention and reduction initiatives, leadership and staff will participate engage the Cranberry Township Police Department and local business security operations in information sharing and safety education initiatives.

**ECONOMIC IMPACT**

The company’s Cranberry location property development plans include building renovations, surface parking, and landscape features that will result in a net increase in assessed real estate value of $56,750. The vacant property is currently assessed at $2,730 and is projected to increase to $59,480 when the project is complete. This increased assessment will increase annual real estate taxes to $9,747 from $447. This new total will break down as $7,316 to the school district, $1,643 to the county, and $788 to the township each year.

Butler County has a more favorable unemployment rate in 2016 (5.2%) compared to that of the state; however, it did have a substantially higher decrease in online job postings from 2015 to 2016 (17.1%) compared to that of the state (10.7%). Additionally, with 150 Education and Health Services employees unemployed in 2016, the company can have a potentially significant favorable impact on this metric by adding jobs to Butler County (PADCED).
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.
**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>
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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).

______________________________    __________
Signature    Title in Applicant’s Business    Date

____________________________________________
Printed Name

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

______________________________    __________
Signature    Title in Applicant’s Business    Date

____________________________________________
Printed Name

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

______________________________    __________
Signature    Title in Applicant’s Business    Date

____________________________________________
Printed Name

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

| Business Name, as it appears on the applicant’s certificate of incorporation, charter, bylaws, partnership agreement or other legal business formation documents: | Keystone Integrated Care, LLC |
| Trade names and DBA (doing business as) names: | N/A |
| Principal Business Address: 5513 William Flynn Hwy, Suite 400, #230 |  |
| City: Gibsonia | State: PA | Zip Code: 15044 |
| Phone: 844-563-2837 | Fax: N/A | Email: info@ki.care |
PENNSYLVANIA DEPARTMENT OF STATE
BUREAU OF CORPORATIONS AND CHARITABLE ORGANIZATIONS

Certificate of Organization
Domestic Limited Liability Company

TCO160827-ID0308

Read all instructions prior to completing. This form may be submitted online at https://www.courts.paslow.gov.

Fee: $125

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

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

2. The (a) address of the limited liability company's initial registered office in this Commonwealth or (b) name of its commercial registered office provider and the county of venue is:
   (Complete (a) or (b) - not both)

   (a) Number and Street
   401 Liberty Avenue, 22nd Floor
   City
   Pittsburgh
   State
   Pennsylvania
   Zip
   15222
   County
   Allegheny

   (b) Name of Commercial Registered Office Provider

   County

   e/o:

3. The name and address, including street and number, if any, of each organizer is (all organizers must sign on page 2):
   Name
   Michael D. Bergonzi
   Address
   DOH REDACTION

Entity#: 6457682
Date Filed: 09/28/2016
Pedro A. Cortés
Secretary of the Commonwealth
4. Strike out if inapplicable:  
A member's interest in the company is to be evidenced by a certificate of membership interest.

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

6. The specified effective date, if any is:  
09/26/2016  
(MM/DD/YYYY and hour, if any)

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

8. The Company shall have perpetual existence.

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

26th day of September, 2016.

Michael D. Bergonzzi  
Sole Organizer  
Title
COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF STATE
BUREAU OF CORPORATIONS AND CHARITABLE ORGANIZATIONS
401 NORTH STREET, ROOM 206
P.O.BOX 8722
HARRISBURG, PA 17105-8722
WWW.CORPORATIONS.PA.GOV

PENNCORP SERVICEGROUP INC
counter
Harrisburg PA 17101

Keystone Integrated Care, LLC

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

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

ENTITY NUMBER : 6457682
SECOND AMENDED AND RESTATED OPERATING AGREEMENT
OF
KEYSTONE INTEGRATED CARE, LLC
(A Pennsylvania Limited Liability Company)

This SECOND AMENDED AND RESTATED OPERATING AGREEMENT of KEYSTONE INTEGRATED CARE, LLC (the “Company”), is dated January 23, 2017 (the “Effective Date”), and has been adopted by the Persons who are Members of the Company on that date.

BACKGROUND

The Company was organized as a Pennsylvania limited liability company by filing a certificate of organization with the Department of State of the Commonwealth of Pennsylvania under the Pennsylvania Limited Liability Company Law of 1994, 15 Pa.C.S. § 8901 et seq., on September 26, 2016.

The members of Keystone Group of Companies, LLC, as the Managers of the Company, executed the initial operating agreement dated October 13, 2016 (the “Initial Agreement”), regarding the capitalization and management of the Company and the rights and obligations of its members.

The Managers subsequently amended and restated the Initial Agreement in its entirety (the “Amended Agreement”) to account for the issuance of new units to investors and to clarify the rights and obligations of the Managers and the Members.

The Managers have amended and restated the Amended Agreement herein to further clarify rights and obligations of the parties with current Members set forth on Schedule A.

Each new Member will and each new Members has (i) except for the Founders, entered into a subscription agreement pursuant to which each has acquired his, her or its respective membership units in the Company and (ii) either executed this Agreement or has executed or will execute a joinder to this Agreement by agreeing to be bound by this Agreement on the terms and conditions fully set forth therein.

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

ARTICLE I
DEFINITIONS

1.1. Definitions. In addition to the terms defined in other provisions of this Agreement, the following terms (whether or not capitalized) shall have the meanings set forth below unless the context requires otherwise:


“Affiliate” means, with respect to any Person, any other Person who, directly or indirectly (including through one or more intermediaries), controls, is controlled by, or is under common
control with, such Person. For purposes of this definition, "control," when used with respect to any specified Person, shall mean the power, direct or indirect, to direct or cause the direction of the management and policies of such Person, whether through ownership of voting securities or partnership or other ownership interests, by contract or otherwise; and the terms "controlling" and "controlled" shall have correlative meanings.

"Agreement" means this Second Amended and Restated Operating Agreement, as amended, modified, supplemented or restated from time to time.

"Application" means the date of the submission by the Company of a medical marijuana permit application to the Commonwealth of Pennsylvania.

"Book Value" means the book value of a Member’s Units as of the applicable Valuation Date, as determined by the accountants regularly servicing the Company’s books in accordance with generally accepted accounting principles consistently applied.

"Business Days" means Monday through Friday of a given week, provided however, for the purposes of calculating any time period of Business Days described in this Agreement, any Business Day on which the United States Post Office is closed for observance of a holiday shall not be counted towards the applicable time period.

"Capital Account" means the individual account maintained by the Company with respect to each Member as provided in Section 4.1 of this Agreement.

"Capital Contribution" means the aggregate amount of cash and the value of any property or services (as determined by the Board of Managers and the Company) contributed by each Member to the Company as provided in Section 4.1. In the case of a Member who acquires Units by Transfer in accordance with the terms of Article XI of this Agreement, "Capital Contribution" means the Capital Contribution of that Member’s predecessor proportionate to the acquired Units.

"Certificate" means the certificate of organization of the Company and any and all amendments thereto and restatements thereof filed on behalf of the Company with the Department of State of the Commonwealth of Pennsylvania pursuant to the Act.

"Class A Member" means an owner of Class A Units.

"Class A Units" means (i) the 1,000 Units issued to Keystone Group of Companies LLC designated as "Founders Units" and (ii) the 370 Units being issued to investors designated as "Series A Units" as of the Effective Date and thereafter. Class A Units shall have the rights (including voting rights), privileges, preference, duties, liabilities, and obligations delineated in this Agreement.


"Independent Third Party" means, with respect to any Member, any Person who is not an Affiliate of such Member.

"Involuntary Transfer" means a Transfer not permitted under this Agreement but which the Company may be required by law to recognize, which may include a Transfer due to (a) bankruptcy
or insolvency proceedings, whether voluntary or involuntary; (b) distribution of marital property
due to divorce; (c) the acquisition or liquidation of a Membership Interest by a creditor or claimant
of a Member; (d) distraint, levy, attachment, execution or other involuntary or unauthorized
Transfer; or (e) a charging order is issued against or in regard to a Membership Interest.

“Majority Interest” means those Voting Units totaling more than fifty percent (50%) of the
outstanding Percentage Interests of the Company held by the Members.

“Manager” means any Person serving at the time as a manager of the Company as provided
in this Agreement. The Managers collectively constitute the “Board of Managers.”

“Member” means (a) each Person identified on the Members Schedule as of the date hereof
as a Member and who has executed this Agreement or a counterpart thereof (each an “Initial
Member”), and (b) each Person who is hereafter admitted as a Member in accordance with the terms
of this Agreement and the Act, in each case so long as that Person is shown on the Company’s
books and records as the owner of one or more Units.

“Membership Interest” means an interest in the Company owned by a Member, including
that Member’s right (based on the types and classes of Units held by that Member) to profits and
losses, to distributions (liquidating or otherwise), allocations, information, and to consent to or
approve actions by the Company, all in accordance with the provisions of this Agreement and the
Act.

“New Units” has the meaning set forth in Section 3.2.2.

“Percentage Interest” means the proportionate interest of a Member in the Company,
expressed as a percentage, determined by dividing the number of Units owned by the Member by
the total number of Units then outstanding. The Percentage Interests of the Members as of the
Effective Date are set forth on Schedule A.

“Person” means a natural person, a partnership, a corporation, a limited liability company, a
joint venture, a government authority, a trust, an association, an estate, an unincorporated
association, or any other entity.

“Preemptive Rights” has the meaning set forth in Section 3.3

“Profits and Losses” means, for each fiscal year or other period, the net income or net loss of
the Company for federal income tax purposes, including all items of the Company’s income, gain,
loss, deduction and credit, and tax-exempt income and non-deductible expenses of the Company.

“Related Party” means a spouse or descendent (whether by blood or adoption) of a Member
or a trust all of the beneficiaries of which are Related Parties.

“Series A Unit” means a Class A Unit which was authorized and issued or sold by the
Company to the Member at least 30 days before the Company’s submission of the Application, and
having the rights, privileges, preference, duties, liabilities, and obligations delineated in this
Agreement.
“Transfer” means to, directly or indirectly, sell, transfer, assign, pledge, encumber, hypothecate or similarly dispose of, either voluntarily or involuntarily, by operation of law or otherwise, or to enter into any contract, option or other arrangement or understanding with respect to the sale, transfer, assignment, pledge, encumbrance, hypothecation or similar disposition of, any Membership Interests owned by a Person or any interest (including a beneficial interest) in any Membership Interests owned by a Person. “Transfer” when used as a noun shall have a correlative meaning. “Transferor” and “Transferee” mean a Person who makes or receives a Transfer, respectively.

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

“Unit” means a unit representing a fractional part of the Membership Interests of the Members and shall include all types, classes or series of Units, including Class A Units (comprised of Series A Units and Founders Units) and any New Units; provided, that any type or class of Unit shall have the privileges, preference, duties, liabilities, obligations and rights set forth in this Agreement, or as may be approved by the Managers or Members pursuant thereto, and the Membership Interests represented by that type, class or series of Unit shall be determined in accordance with such privileges, preference, duties, liabilities, obligations and rights.

“Valuation Date” means the last day of the month immediately preceding the date (a) on which a Member first offers to sell all or a portion of its Units to the Company, in the case of a sale pursuant to Section 11.3.1 of this Agreement; or (b) on which a Member’s Units or any part thereof becomes subject to an Involuntary Transfer, in the case of a sale pursuant to Section 11.3.6 of this Agreement.

“Voting Units” means all Class A Units.

ARTICLE II
ORGANIZATION

2.1. Principal Place of Business; Other Offices. The principal place of business of the Company shall be at 401 Liberty Avenue, 22nd Floor, Pittsburgh, Pennsylvania 15222, or at such other place as the Board of Managers may designate from time to time, which need not be in the Commonwealth of Pennsylvania. The Company may have such other offices as the Managers may designate from time to time.

2.2. Purpose. The object and purpose of, and the nature of the business to be conducted and promoted by, the Company is to (a) engage in any act or activity for which limited liability companies may be organized under the Act; and (b) engage in any and all activities necessary, convenient, desirable, or incidental to any of the foregoing. The Company shall have all the powers necessary or convenient to carry out the purposes for which it is formed, including the powers granted by the Act.

ARTICLE III
MEMBERSHIP UNITS
3.1. **Units Generally.** The Membership Interests of the Members will be represented by issued and outstanding Units, which may be divided into one or more types, classes or series as determined by the Board of Managers. Each type, class or series of Units shall have the privileges, preference, duties, liabilities, obligations and rights, including voting rights, if any, fixed by the Board of Managers. The Managers shall maintain a schedule of all Members, their respective mailing addresses and the amount, class, type and/or series of Units held by them (the "Members Schedule"), and shall update the Members Schedule upon the issuance or transfer of any Units to any new or existing Member pursuant to Section 7.1 or Article XI, as applicable. A copy of the Members Schedule as of the execution of this Agreement is attached as Schedule A.

3.2. **Authorization of Units.**

3.2.1. **Series A Units.** The Company is hereby authorized to issue or sell a series of Class A Units designated as Series A Units. As of the Effective Date and giving effect to the transactions contemplated by the subscription agreements and this Agreement, 370 Series A Units are issued and outstanding to the Members in the amounts set forth on the Schedule A opposite each Member’s name. The Company has previously issued 1,000 Class A Units designated as Founders Units in the amounts set forth on the Schedule A opposite each Member’s name.

3.2.2. **Other Issuances.** In addition to Class A Units, the Company may, subject to Section 3.3, authorize and issue or sell to any Person any of the following (collectively, "New Units"): any new type, class or series of Units, which Units may be designated as classes or series of preferred units, common units or incentive units. The Managers shall, subject to Section 12.4, amend this Agreement to reflect an issuance and to fix the relative privileges, preference, duties, liabilities, obligations and rights of any of these New Units, including the number of such New Units to be issued, the preference (with respect to distributions, in liquidation or otherwise) over any other Units and any contributions required in connection therewith.

3.3. **Preemptive Rights.** The Company shall not issue any New Units, or any other type of new security, without first offering those New Units (or other new security) to each Member holding one or more Class A Units in proportion to his, her or its respective Percentage Interests at the same price proposed to be issued to third parties and approved by the Board of Managers. The Company shall give those Members holding one or more Class A Units at least fifteen (15) days from the date of the offer in which to accept and twenty (20) days thereafter to make payment; provided, however, preemptive rights will not apply to any Class A Units issued by the Company, or New Units issued or sold in connection with (i) a grant to any existing or prospective Managers, Officers, employees or other service providers pursuant to any incentive plan or similar equity-based plans or other compensation agreement; (ii) any merger consolidation or other business combination involving the Company; or (iii) any subdivision of Units (by a split of Units or otherwise), payment of distributions or any similar recapitalization. Any offer will be in writing and will be at such price and on such other terms and conditions as would be applicable to the proposed issuance. Notwithstanding the foregoing, the Company shall not issue any New Units for less than full and adequate consideration (in cash or in kind or in return for services for which payment is then due).

3.4. **Record Holders of Units.** The Company may treat the Person whose name and Units stand on the books and records of the Company as the absolute owner of those Units and as a Member of the Company. The Company is not required to recognize any equitable or other claim to, or interest
in, any Units on the part of any other Person, regardless if the Company has notice of any Person’s claim.

3.5. Evidence of Units; Legend. The Company may certificate Units. If certificated, those Units shall bear the following legend:

THE UNITS REPRESENTED BY THIS CERTIFICATE ARE SUBJECT TO AN AMENDED AND RESTATED LIMITED LIABILITY COMPANY OPERATING AGREEMENT, AS MAY BE AMENDED, AMONG THE COMPANY AND ITS MEMBERS, A COPY OF WHICH IS ON FILE AT THE PRINCIPAL EXECUTIVE OFFICE OF THE COMPANY. NO TRANSFER, SALE, ASSIGNMENT, PLEDGE, HYPOTHECATION OR OTHER DISPOSITION OF THE UNITS REPRESENTED BY THIS CERTIFICATE MAY BE MADE EXCEPT IN ACCORDANCE WITH THE PROVISIONS OF SUCH AMENDED AND RESTATED LIMITED LIABILITY COMPANY OPERATING AGREEMENT.

THE UNITS REPRESENTED BY THIS CERTIFICATE HAVE NOT BEEN REGISTERED UNDER THE SECURITIES ACT OF 1933, AS AMENDED, OR UNDER ANY OTHER APPLICABLE SECURITIES LAWS AND MAY NOT BE TRANSFERRED, SOLD, ASSIGNED, PLEDGED, HYPOTHECATED OR OTHERWISE DISPOSED EXCEPT (A) PURSUANT TO A REGISTRATION STATEMENT EFFECTIVE UNDER SUCH ACT AND LAWS, OR (B) PURSUANT TO AN EXEMPTION FROM REGISTRATION THEREUNDER.

CAPITAL CONTRIBUTIONS, FINANCING AND TAX MATTERS

4.1. Capital Accounts and Capital Contributions. The Company shall keep a record of the Capital Contributions made by the Members. A Member is not be required (i) to make any capital contribution to the Company, unless the Member and the Managers specifically agree to a contribution in writing; or (ii) to restore any negative balance in his, her or its Capital Account at any time.

4.2. Return of Contributions. A Member is not entitled to the return of any part of the Member’s Capital Contribution, or to be paid interest in respect of the Member’s Capital Account or Capital Contribution. An unrepaid Capital Contribution is not a liability of the Company or of any Member. A Member is not required to contribute or to lend any cash or property to the Company to enable the Company to return any Member’s Capital Contributions.

4.3. Advances by Members. A Member may, with the consent of the Board of Managers, loan funds to or guarantee obligations of the Company. A Member’s loan to the Company or guarantee of its obligations by a Member is not a Capital Contribution.


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

4.5. **Modification.** The foregoing provisions and the other provisions of this Agreement relating to the maintenance of Capital Accounts are intended to comply with Treasury Regulations Section 1.704-1(b) and shall be interpreted and applied in a manner consistent with such Treasury Regulations. If the Managers determine that it is prudent to modify the manner in which the Capital Accounts, or any increases or decreases to the Capital Accounts, are computed in order to comply with such Treasury Regulations, the Managers may authorize those modifications.

4.6. **Tax Returns.** The Board of Managers shall arrange for the preparation of all tax returns required to be filed for the Company. Each Member shall be entitled to receive, upon written request, copies of all federal, state and local income tax returns and information returns, if any, which the Company is required to file. All information needed by the Members and other Persons who were Members during the applicable taxable year for income tax purposes shall be prepared by the Company’s accountants and furnished to each such Person within seventy-five (75) days after the end of each taxable year of the Company.

4.7. **Tax Elections.**

   4.7.1. *Elections to be Made.* If permitted by applicable tax law, the Company may make the following elections on the appropriate tax returns:

   4.7.1.1. to adopt the calendar year as the Company’s taxable year;

   4.7.1.2. to adopt the cash method of accounting and to keep the Company’s books and records on the income-tax method;

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

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

   4.7.1.5. any other election the Members may deem appropriate and in the best interests of the Members.
4.7.2. **No Election of Corporate Taxation.** Neither the Company nor any Member may make an election for the Company to be taxable as a corporation for federal income tax purposes or to be excluded from the application of the provisions of subchapter K of chapter 1 of subtitle A of the Code or any similar provisions of applicable state law, and no provision of this Agreement shall be construed to sanction or approve such an election.

4.8. **Tax Matters Partner.** If the Company is subject to the consolidated audit procedures of Sections 6221 to 6234 of the Code, the “tax matters partner” of the Company shall be Keystone Group of Companies, LLC. The Tax Matters Partner shall take such action as may be necessary to cause each other Member to become a “notice partner” within the meaning of Section 6223 of the Code. The Tax Matters Partner shall inform each other Member of all significant matters that may come to his attention in his capacity as tax matters member by giving notice thereof on or before the fifth (5th) business day after becoming aware thereof and, within that time, shall forward to each other Member copies of all significant written communications he may receive in that capacity. The Company shall reimburse the tax matters partner for any costs incurred representing the interests of the Members in respect of Company tax matters.

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

**ALLOCATIONS AND DISTRIBUTIONS**

5.1. **Profits and Losses.** If there is more than one Member, Profits and Losses shall be allocated to the Members in accordance with the Percentage Interests shown on Schedule A.

5.2. **Distributions.**

5.2.1. **General Rule.** All cash or other property that the Board of Managers determines to be available for distribution to the Members shall be distributed to the Members in accordance with their respective Percentage Interest in accordance with this Agreement. In making determinations regarding distributions, the Board of Managers may set aside funds and establish reserves for such items as the Board of Managers shall determine, including, without limitation, working capital, capital expenditures, acquisition of other assets by the Company, and the satisfaction of liabilities (including, without limitation, contingent liabilities).
5.2.2. **Minimum Distribution.** With respect to any taxable year of the Company in which Members are allocated taxable income for federal income tax purposes (and for this purpose all items of income, gain, loss, or deduction required to be separately stated pursuant to Section 703 of the Code shall be included in the calculation of taxable income (other than the amount, if any, by which capital losses exceed capital gains)), the Company shall distribute to the Members, within ninety (90) calendar days after the close of that taxable year (and, if reasonable and practicable, at such times during the taxable year as are required to fund the payment of estimated taxes), no less than the amount determined by multiplying the Company’s taxable income (computed as set forth in this sentence) by the highest composite federal, state, and local income tax rate applicable to any Member (including, in the case of a member that is a pass-through entity, any other person taxable on company income). For purposes of the preceding sentence, the Company’s taxable income for a year shall be reduced by any net loss of the Company in prior years that has not previously been so taken into account under this Section 5.2. Nothing herein shall require the Company to borrow money or reduce its cash flow so as to restrict its ability to operate the day-to-day activities of the business in order to make such distributions. All distributions to a Member pursuant to this Section 5.2 shall be treated as advances of, and offset against, amounts otherwise distributable to such Member under this Agreement.

5.3. **Establishment of Reserves.** The Board of Managers may establish reasonable reserves for maintenance, improvements, acquisitions, capital expenditures and other contingencies, these reserves to be funded with that portion of the operating revenues of the Company as the Board of Managers may deem necessary or appropriate for that purpose.

6.1. **Management by Managers.**

6.1.1. **Exclusive Responsibility.** A Board of Managers shall manage the business and affairs of the Company and shall have the authority to amend and restate this Agreement as necessary or useful to conduct the business and affairs of the Company. A Member shall not take part in, or interfere with, the management of the Company, and a Member shall not act for or bind the Company. The Company may act only by actions taken by or under the direction of the Board of Managers in accordance with this Agreement.

6.1.2. **Delegation.** The Managers may appoint those officers necessary or desirable to conduct the Company’s business and affairs. The Managers may elect a Member, Manager or other Person to serve as an officer of the Company. The Managers may assign titles to the officers they elect. If the Managers assign a title for an officer that is one commonly used for officers of a business corporation, that officer will have the authority and duties usually associated with that officer, unless the Managers specify otherwise. A Person may hold multiple offices. The Managers may fix the salaries or other compensation of the officers of the Company.

6.2. **Non-exclusive Service.** The Managers must devote only that amount of time the Board of Managers determines necessary for the efficient conduct of the Company.

6.3. **Removal.** At any meeting of Members at which a quorum of Members is present that is called expressly for that purpose, or pursuant to a written consent adopted pursuant to this Agreement, a Manager may be removed from the position of Manager (but not as a Member), with or without cause, by a vote of the Members holding 80% or more of the Units entitled to vote. If a Manager is removed, that Manager shall continue to act as a Manager of the Company until the
Members elect a replacement Manager, at which time the removed Manager will stop being a Manager of the Company.

6.4. **Resignation of Managers.** A Manager may resign at any time upon written notice to the Board of Managers. Unless otherwise specified in writing, a Manager’s resignation will be effective at the time of notice. If the resigning Manager is a Member, his, her or its resignation will not affect his, her or its rights as a Member or constitute a withdrawal of that Member.

6.5. **Election of Managers.** If the Board of Managers determines that a Manager should be elected because a vacancy on the Board of Managers exists, the Members may elect a Manager to fill the vacancy by an affirmative vote of at least 75% of the Percentage Interests in the Company.

6.6. **Number; Appointment; Qualifications.**

6.6.1. **Number and Qualification.** The Board of Managers will initially consist of two (2) Managers, unless the initial Managers agree to expand the Board to no more than five (5). Managers need not be Members or residents of the Commonwealth of Pennsylvania. As of the Effective Date, the Managers of the Company are Thomas Perko and Russell L. Cersosimo, Jr.

6.6.2. **Term of Office.** Each Manager will hold office until his or her death, resignation or removal.

6.6.3. **Voting.** Each Manager has one vote on the Board of Managers.

6.7. **Meetings of Board of Managers.**

6.7.1. **Notice of Meeting and Quorum.** Any Manager may call a meeting of the Board of Managers upon five (5) days’ notice in writing (which may be by facsimile or electronic mail), which notice must specify the date, time and purpose(s) of the meeting. The Board of Managers may meet at such times and places as they decide. Managers may be present at any meeting of the Board of Managers by telephone, if each Manager can hear all other present Managers. A majority of the Managers will constitute a quorum for any meeting of the Board of Managers.

6.7.2. **Waiver of Notice.** Whether before or after a meeting, a Manager may waive the required notice of a meeting if he, she or it provides written notice to the Company of the waiver. A Manager’s attendance at any meeting of the Board of Managers will constitute a waiver of notice of that meeting, unless the Manager attends the meeting only to object to the transaction of any business because that the meeting has not lawfully called or convened. Neither the business to be transacted at, nor the purpose of, any regular or special meeting of the Board need be specified in the notice or waiver of notice of such meeting.

6.8. **Action by the Board of Managers.**

6.8.1. **Decisions.** The Board of Managers shall make decisions either by a majority vote of the Managers in attendance at a duly called and held meeting at which a quorum is present or by unanimous written action without a meeting signed by all of the Managers.

6.8.2. **Deadlock.**
6.8.2.1. If either at a meeting or by written consent the Board of Managers cannot reach a decision by the required vote regarding an issue submitted for consideration by the Managers (a “Deadlock”), the Managers shall refer the issue subject to the Deadlock to the Members, who shall resolve the issue by a vote pursuant to Section 7.2 below. If the Members’ vote is required to break the Deadlock, the Members’ vote must take place within seven days of the Deadlock, or within such other time period as all of the Members might agree. If the Members resolve the Deadlock by a proper vote, the Members decision will be final and binding on the Company, the Managers and the Members.

6.8.2.2. If there is a Deadlock, the Company shall continue to operate in a manner consistent with its prior practices and this Agreement until that Deadlock is resolved. If the Deadlock involves the approval of the Company’s annual business plan or budget, the Company shall operate its business in accordance with the business plan or budget then in effect.

6.9. Limitations on Actions of Managers.

6.9.1. The Board of Managers shall have broad powers to govern the Company and to make all decision relating to the Company’s operations not delegated to the Officers in writing and the Members shall have only those powers specifically enumerated in the Agreement; provided, however, regardless of the foregoing provision of this Article VI, the Board of Managers shall not:

6.9.1.1. Perform any act that contravenes this Agreement, the Act or applicable law;

6.9.1.2. Perform any act which would impose personal liability on Members;

6.9.1.3. Perform any act which would make it impossible to carry on the business purpose of the Company;

6.9.1.4. Appoint Managers, other than as provided in this Agreement;

6.9.1.5. Possess Company property, or assign rights in specific Company property, for other than a Company purpose;

6.9.1.6. Approve an amendment to this Agreement, without the approvals required by Section 11.4 hereof; and

6.9.1.7. Approve any (i) sale of all or substantially all the assets or liabilities of the Company, (ii) sale of all or substantially all the equity interests of the Company, or (iii) merger affecting a similar result and to cause a change of control of the Company’s ownership, without the approval of the Members as set forth in Section 7.3.

6.10. Compensation; No Employment.

6.10.1. Managers may be reimbursed for reasonable out-of-pocket costs and expenses incurred in the course of their service as Managers. A Manager may also serve the Company in other capacities and may receive reasonable compensation for those services.
6.10.2. This Agreement does not, and is not intended to, confer upon any Manager any rights with respect to continued employment by the Company, and nothing herein should be construed to have created any employment agreement with any Manager.

6.11. **Conflicts of Interest.**

6.11.1. **Other Business Opportunities.** A Manager may engage in and possess interests in other non-competing business ventures and is not required to offer the Company or any Member or Manager the right to participate in that business venture.

6.11.2. **Interested Transactions.** To be valid, the Board of Managers must approve any contract or transaction between the Company and a Member or an Affiliate of a Member, or between the Company and a Manager or a member of a Manager’s immediate family, or between the Company and another domestic or foreign association in which a Manager has a management role or a financial or other interest.

6.11.3. **Limitation of Liability.** A Manager shall not be personally liable for monetary damages (other than under criminal statutes and under federal, state and local laws imposing liability on managers for the payment of taxes) for any action taken, or any failure to take any action, unless the Manager’s conduct constitutes self-dealing, willful misconduct or recklessness. If this section 6.11.3 is amended or repealed, a Manager will not be liable for any action taken, or any failure to take any action before the amendment or repeal of this Section. If the Act is amended to permit a Pennsylvania limited liability company to provide greater protection from personal liability for its managers, then this section shall be read to include that greater protection for the Managers.

7.1. **New Members.**

7.1.1. New Members may be admitted from time to time (i) in connection with an issuance of Units by the Company, subject to compliance with Section 3.3, and (ii) in connection with a Transfer of Units, subject to compliance with the provision of Article XI, and in the case of either (i) or (ii), following compliance with the provisions of Section 7.1.2.

7.1.2. In order for any Person who is not already a Member of the Company to be admitted as a Member, whether pursuant to an issuance of Units or a Transfer of Units, that Person must (i) be unanimously approved to become a Member by the Managers and (ii) execute this Agreement or a joinder agreement or other agreement of similar import and effect satisfactory to the Managers. Upon the amendment of the Members Schedule by the Managers and the satisfaction of any other applicable conditions, including, if a condition, the receipt by the Company of payment for the issuance of the applicable Units, that Person shall be admitted as a Member and deemed listed as such on the books and records of the Company and thereupon shall be issued his, her or its Units. The Managers shall also adjust the Capital Accounts of the Members as necessary in accordance with Section 4.5.

7.2. **Voting Rights of Members.** Each Class A Unit, entitles the Member holding it to one vote on each action to be voted on by the Members. To vote on any Company matter, a Person must be a Member.
7.3. **Action by Members.** Except as otherwise provided in the Act, the Certificate or this Agreement (such as with the removal of a Manager in Section 6.3), if an action requires the Members to vote, that action will only be authorized by the affirmative vote of Members holding a majority of Units entitled to vote. An abstention, even if recorded, does not count as a vote.

7.4. **Meetings of Members.**

7.4.1. **Quorum.** A quorum of any meeting of the voting Members requires the presence of the Members holding a majority of the appropriate Voting Units held by all Members. Except as otherwise provided in this Agreement, no action at any meeting may be taken by the Members unless the appropriate quorum is present. Subject to Section 7.7.1, no action may be taken by the Members at any meeting at which a quorum is present without the affirmative vote of Members holding a majority of the appropriate Voting Units held by all Members.

7.4.2. **Location.** Subject to Section 7.7, all meetings of the Members shall be held at the principal place of business of the Company or at such other place within or without the Commonwealth of Pennsylvania as shall be specified or fixed in the notice thereof.

7.4.3. **Adjournment.** Subject to Section 7.7, the chairman of the meeting or the Members present and entitled to vote shall have the power to adjourn a meeting from time to time, without any notice other than announcement at the meeting of the time and place at which the adjourned meeting will be held.

7.4.4. **Call of Meetings.** A meeting of the Members for any proper purpose or purposes may be called at any time by any Manager or by Members entitled to cast at least 50% of the votes that all Members are entitled to cast at the particular meeting. Subject to Section 7.7, only business within the purpose or purposes described in the notice of the meeting may be conducted at a meeting of the Members. The notice will specify the location of the meeting, which may be within or outside the Commonwealth of Pennsylvania.

7.4.5. **Notices.** Notice of any meeting of Members shall be given to the Members at least ten (10) days before that meeting in the manner set forth in Section 12.2 of this Agreement.

7.4.6. **Waiver of Notice.** Whether before or after a meeting, a Member may waive its notice of a meeting in writing. If a Member attends a meeting, he, she or it hereby agrees to waive any required notice of a meeting, unless the Member attends the meeting only to object to the transaction of any business on the ground that the meeting was not lawfully called or convened.

7.5. **Proxies.** If the Members vote on a matter, a Member may vote in person or by proxy, and that proxy may be granted in writing, by means of electronic transmission or as otherwise permitted by applicable law or this Agreement. A Member may revoke its proxy, unless the proxy specifies otherwise, but a Member's revocation will not invalidate or otherwise affect actions taken under that proxy before it was revoked.

7.6. **Conduct of Meetings.** All meetings of the Members shall be presided over by the chairman of the meeting, who shall be designated by the Board of Managers. The chairman of any meeting of Members will determine the order of business and the procedure at the meeting, including the manner of voting and the conduct of discussion as seem to him or her fair to the Members.
7.7. Action by Consent or Remote Participation.

7.7.1. Action by Consent. If the Members may vote on an action, the Members may also vote on that action by the written consent of the Members. The Members' consents shall be in writing or in electronic form and shall be filed with the Board of Managers.

7.7.2. Remote Participation. The Members may participate and act, including voting, at a meeting of Members by conference telephone or other electronic means, including the Internet.

7.8. Liability of Members. Except as otherwise expressly required pursuant to a non-waivable provision of the Act, the debts, obligations and liabilities of the Company, whether arising in contract, tort or otherwise, shall be solely the debts, obligations and liabilities of the Company, and none of the Members shall be obligated personally for any such debt, obligation or liability of the Company solely by reason of subscribing for a Membership Interest or being a Member of the Company. Notwithstanding anything to the contrary in this Agreement, no third party or any creditor of the Company shall have any right to require any Member to make any Capital Contribution, loan or other advance to the Company. Except as otherwise expressly provided in a non-waivable provision of applicable law, the liability of each Member hereunder is limited to the amount of such Member's subscription commitment.

7.9. No Withdrawal. A Member shall not withdraw or resign as a Member before the dissolution or winding up of the Company, and any withdrawal or resignation or attempted withdrawal or resignation by a Member before the dissolution or winding up of the Company will be null and void. A Person ceases to be a Member only when its ceases to hold any Units of the Company.

ARTICLE VIII
INDEMNIFICATION OF MANAGERS, MEMBERS, OFFICERS
AND OTHER AUTHORIZED REPRESENTATIVES

8.1. Indemnification. The Company shall indemnify any Person who was or is a party or is threatened to be made a party to any threatened, pending, or completed action or proceeding, including actions by or in the right of the Company, whether civil, criminal, administrative, or investigative; by reason of the fact that the Person is or was a Manager or an officer of the Company; or is or was serving while a Manager or an officer of the Company at the request of the Company as a director, manager, officer, employee, agent, fiduciary, or other representative of another corporation (for profit or not-for-profit), limited liability company, partnership, joint venture, trust, employee benefit plan, or other enterprise, against all liabilities, expenses (including without limitation attorneys' fees), damages, judgments, fines, penalties, excise taxes, and amounts paid in settlement in connection with the action or proceeding unless the act or failure to act by the Person giving rise to the claim for indemnification is determined by a court to have constituted willful misconduct or recklessness. The Company shall have the power to indemnify employees and agents of the Company on the same basis as provided in this Section with respect to Managers and officers, and to advance expenses to employees and agents on the same basis as provided in Section 8.2 of this Agreement, as the Managers may from time to time determine or authorize.

8.2. Advancement of Expenses. If the Company receives an undertaking by or on behalf of the Person required to repay the amounts advanced if a court determines that that the Company does not have to indemnify that Person, the Company shall pay in advance of the final disposition of the
action or proceeding the costs and expenses (including without limitation reasonable attorneys' fees) incurred by any Person who was or is a Manager or an officer of the Company in defending any action or proceeding referred to in Section 8.1 of this Agreement.

8.3. **Exception.** The Company shall not, however, indemnify any Person under Section 8.1 or advance expenses under Section 8.2 if that Person commenced the proceedings, claims, or actions, with the exception of mandatory counterclaims and affirmative defenses proffered by that Person.

8.4. **Interpretation.** The indemnification and advancement of expenses provided by or pursuant to this Article VIII shall not be deemed exclusive of any other rights to which any Person seeking indemnification or advancement of expenses may be entitled under any insurance policy, agreement, vote of Managers, or otherwise, both as to actions in the Person's official capacity and as to actions in another capacity while holding an office, and shall continue as to a Person who has ceased to be a Manager or an officer and shall inure to the benefit of the heirs, executors, and administrators of the Person. The provisions of this Article VIII are adopted pursuant to the authority set forth in the Act and are intended to fall within the scope of the permissible provisions of an operating agreement authorized by that section of the Act. If the Act is amended to permit a Pennsylvania limited liability company to provide greater rights to indemnification and advancement of expenses for its Managers and officers than the express terms of this Article VIII, this Article VIII shall be construed to provide for those greater rights.

8.5. **Contract.** The Company's duties to indemnify and to advance expenses to a Manager or an officer as provided in this Article VIII are contractual between the Company and each Person, and no amendment or repeal of any provision of this Article VIII shall alter, to the detriment of any Person, that Person's right to the advancement of expenses or indemnification related to a claim based on an act or failure to act that took place prior to the amendment or repeal or the termination of the service of that Person as a Manager or officer, whichever is earlier.

### ARTICLE IX
BOOKS, RECORDS, REPORTS AND BANK ACCOUNTS

9.1. **Maintenance of Books.**

9.1.1. **Financial Records.** The Managers shall determine how the Company's books and records will be maintained, but the Managers shall maintain the Capital Accounts pursuant to Section 4.1 of this Agreement.

9.1.2. **Company Records.** The Company shall also keep the following records:

9.1.2.1. a list setting forth the full name and last known mailing address of each Member and Manager;

9.1.2.2. a copy of the Certificate and all amendments thereto;

9.1.2.3. copies of all of the Company's federal, state, and local income tax returns and annual financial statements;

9.1.2.4. copies of the currently effective written Agreement, and all amendments thereto, and copies of any operating agreements no longer in effect; and

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9.1.2.5. minutes of the proceedings of the Board of Managers and Members.

9.2. Reports. The Company shall prepare or cause to be prepared those reports and financial statements the Board of Managers determined to be appropriate or as otherwise required by law.

9.3. Financial Accounts. The Board of Managers shall establish and maintain one or more separate bank and investment accounts in the Company’s name. The Board of Managers shall not commingle the Company’s funds with the funds of any Member.

ARTICLE X
DISSOLUTION, LIQUIDATION AND TERMINATION

10.1. Dissolution. The Company shall dissolve, and its affairs shall be wound up, upon the first to occur of the following:

10.1.1. the unanimous vote of the Managers to dissolve the Company;

10.1.2. the sale, exchange, involuntary conversion, or other disposition or transfer of all or substantially all the assets of the Company; or

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

10.2. Liquidation and Distribution. If the Company dissolves pursuant to any provision of Section 10.1, the Company shall not conduct any further business, except it may take those actions necessary to wind up its affairs and it may distribute its assets to the Members pursuant to this Article X. Upon dissolution, the Managers must appoint one or more persons as liquidator, and the liquidator will have full authority to wind-up the affairs of the Company and to make final distribution as provided herein. If any Member is indebted to the Company, the liquidator may set off that debt, dollar for dollar, against such Member’s distributable share, whether or not that debt is otherwise due.

The liquidator shall determine which Company assets, if any, will be distributed in kind and will dispose of all other Company assets at the best cash price obtainable therefor (whether payable currently or in installments).

The proceeds of the liquidation and any other funds of the Company will be distributed as follows:

10.2.1. First, to creditors, including Members who are creditors, as provided in the Act, and to the establishment of such reserves as the liquidator may deem reasonably necessary for contingent or unforeseen liabilities or obligations of the Company which may be held in escrow for a reasonable period of time and then distributed as next provided; and then

10.2.2. After all of the payments required by Section 10.2.1 have been made, any remaining assets of the Company shall be distributed to the Members as follows:

10.2.3. The balance first to Members holding Class A Units in accordance with their respective Percentage Interests.
10.3. **Certificate of Dissolution.** On completion of the liquidation of the Company’s assets, the Company will terminate, and the Board of Managers (or such other Person or Persons as the Act may require or permit) shall file a Certificate of Dissolution with the Department of State of the Commonwealth of Pennsylvania and take those other actions that may be necessary to terminate the Company’s existence.

**ARTICLE XI**

**RESTRICTIONS ON TRANSFER OF UNITS**

11.1. **Restrictions on Right to Transfer.**

11.1.1. Except as permitted pursuant to Section 11.2 or in accordance with the procedures set forth in this Article XI, no Member shall Transfer all or any portion of its Units in the Company. A Transfer of a Member’s Units to a Person not already a Member of the Company shall be deemed completed until the prospective Transferee is admitted as a Member of the Company in accordance with Article VII.

11.1.2. Any Transfer or attempted Transfer of any Units in violation of this Agreement shall be null and void, no such Transfer shall be recorded on the Company’s books and the purported Transferee in any such Transfer shall not be treated (and the purported Transferor shall continue to be treated) as the owner of those Units for all purposes of this Agreement.

11.2. **Permitted Transfers.** The provisions of Sections 11.3 and 11.4 shall not apply to any Transfer by any Member of all or any portion of its Units to any of the following:

11.2.1. Any Affiliate of such Member; or

11.2.2. (i) such Member’s spouse, parent, siblings, descendants (including adoptive relationships and stepchildren) and the spouses of each of those natural persons (collectively, “Family Members”); (ii) a trust under which the distribution of a Member’s Units may be made only to such Member and/or any Family Member of such Member; (iii) a charitable remainder trust, the income from which will be paid to such Member during his life; (iv) a corporation, partnership or limited liability company, the stockholders, partners or members of which are only such Member and/or Family Members of such Member; or (v) by will or by the laws of intestate succession, to such Member’s executors, administrators, testamentary trustees, legatees or beneficiaries.

11.3. **Right of First Refusal.**

11.3.1. **Offer to Company.** If any Member wishes to sell any of its Class A Units (the “Member Offeror”), he shall first either (i) obtain a bona fide, legally enforceable written offer, acceptable to him, from a third party to purchase such Class A Units for consideration consisting solely of cash (“Third Party Offer”), or (ii) prepare his own written offer to sell those Class A Units for consideration consisting solely of cash (“Member Offer”). Such Member Offeror shall then give a copy of the Third Party Offer or Member Offer (as the case may be) to the Company accompanied by the Member Offeror’s written notice (the “Sale Notice”) that he wishes to sell such Class A Units to the Company in accordance with the Third Party Offer or the Member Offer.
11.3.1.1. **Offering.** Immediately upon receipt of the Sale Notice, the Company shall give a copy of the Sale Notice to each Member holding one or more Class A Units ("Class A Member"), accompanied by a copy of the Third Party Offer or the Member Offer (as the case may be).

11.3.1.2. **Company Acceptance Period.** The Company shall have sixty (60) days from receipt of the Sale Notice (the "Acceptance Period") within which to accept the offer to sell the Class A Units. An acceptance by the Company may be of any or all of the Member's Class A Units being offered and must be authorized by action of the Company's Board of Managers in which action neither the Member Offeror nor (in the case of a Third Party Offer) the offeree shall participate.

11.3.2. **Offer to Members.** If the Company does not elect to purchase all of the Offeror Member's Class A Units offered pursuant to the Sale Notice, then it shall notify each Class A Member in writing no longer than thirty (30) days after receipt by it of the Sale Notice and each Class A Member (other than the offeree) shall have the right to purchase any of the Units not purchased by the Company. For each Class A Member, the number of Class A Units which he shall be permitted to purchase will be determined on a pro rata basis, by dividing the number of Units owned by the Class A Member by the number owned by all Class A Members other than the offeree or Member Offeror, as the case may be (rounded to eliminate fractional Units). If any Class A Members fail to accept all of the Class A Units offered to them, then those Class A Units shall be allocated among the remaining Class A Members wishing to purchase the excess Class A Units (again on a pro rata basis according to the relative number of Units owned by each Class A Member). At the conclusion of this process, the Company will notify all parties of the number of Units permitted to be purchased by the Company and each accepting Class A Member.

11.3.3. **Failure to Accept Written Offer.** If, following the application of the preceding Sections 11.3.1 and 11.3.2., all of the Class A Units being offered have not been accepted by the Company and/or the Class A Members, the offeror shall sell the Class A Units which were accepted or may, by giving notice to the Company within ten (10) days after the Company's giving of notice to him of the partial acceptances, reject all such acceptances.

11.3.4. **Sales to Third Parties Following a Third Party Offer.** Any Class A Units not purchased by the Company and/or the Class A Members following the application of Sections 11.3.1 through 11.3.3 after receipt of a Third Party Offer may be sold by the offeror to the Person named in the Third Party Offer, but only at the price set forth therein; provided, however, that no such sale shall take place unless (a) such third party agrees to become a party to this Agreement by executing a joinder agreement in form satisfactory to the Managers, and (b) any Transfer to a third party must be completed within one hundred eighty (180) days following the date of the Company's final notice to the offeror described in Section 11.3.2. Upon completion of the sale subject to the conditions set forth in this Agreement, such third party shall have all of the rights and obligations of a Transferee, as described in Section 11.4 of this Agreement, but shall not be admitted as a Member unless such admission is unanimously approved by the Managers. Any Member's Class A Units not so sold to a third party will again become subject to the terms of this Agreement, and will not thereafter be Transferred to a third party without again complying with all of the requirements of this Article XI.
11.3.5. Sales to Third Parties Following a Member Offer. Any Class A Units not purchased by the Company and/or the Class A Members following the application of Sections 11.3.1 through 11.3.3 after receipt of a Member Offer may not thereafter be sold by the Member Offeror unless and until the offeror has obtained a Third Party Offer or made another Member Offer with respect to such Class A Units and has again complied with all of the requirements of this Article XI.

11.3.6. Foreclosure. If any legal proceedings are taken in connection with the insolvency of a Member, or in the event of the attachment of or levy upon or other Involuntary Transfer (including by way of divorce) of any Units by any creditor or claimant against the owner thereof, the party to whom the Units are Transferred or the Member, as the case may be, shall immediately offer the Units so Transferred, or in the case of a Member’s insolvency, all of such Member’s Units, to the Company at the Book Value. If no such offer is received by the Company prior to its receipt of actual notice of an event described above, such an offer shall be deemed to have been made to the Company on the Company’s receipt of actual notice of such event. Thereafter, all of the provisions of this Article XI will apply to such offer.

11.4. Rights of Transferees.

11.4.1. Transferee Not a Member. A Transferee who does not become a Member pursuant to Section 7.1 may receive distributions of cash or other property and allocations from the Company attributable to the Member’s Units Transferred and shall receive the tax information set forth in Section 4.6 of this Agreement; provided, however, except as may be required by the Act, a Transferee who is not or does not become a Member shall have no right to any other information or accounting or to inspect the Company’s books and records or to vote on any matter or to enjoy any other right of a Member under the Act or this Agreement. That Transferee shall, however, be bound by all the obligations of a Member, including the restrictions on a further Transfer of that Transferee’s interest.

11.4.2. Capital Account of Transferee. If the Transfer of Units is valid under this Article XI and the Transferee becomes a Member, the Transferee shall succeed to the corresponding portion of the Capital Account of the Transferor.

ARTICLE XII
GENERAL PROVISIONS

12.1. Confidentiality.

12.1.1. Each Member acknowledges, it will have access to and become acquainted with trade secrets, proprietary information and confidential information belonging to the Company and its Affiliates that are not generally known to the public, including, but not limited to, information concerning business plans, financial statements and other information provided pursuant to this Agreement, operating practices and methods, expansion plans, strategic plans, marketing plans, contracts, customer lists or other business documents that the Company treats as confidential, in any format whatsoever (including oral, written, electronic or any other form or medium) (collectively, “Confidential Information”). In addition, each Member acknowledges that: (i) the Company has invested, and continues to invest, substantial time, expense and specialized knowledge in developing its Confidential Information; (ii) the Confidential Information provides
the Company with a competitive advantage over others in the marketplace; and (iii) the Company would be irreparably harmed if the Confidential Information were disclosed to competitors or made available to the public. Without limiting the applicability of any other agreement to which any Member is subject, no Member shall, directly or indirectly, disclose or use (other than solely for the purposes of such Member monitoring and analyzing its investment in the Company), including, without limitation, use for personal, commercial or proprietary advantage or profit, either during its association with the Company or thereafter, any Confidential Information of which that Member is or becomes aware. Each Member in possession of Confidential Information shall not disclose such Confidential Information to any Person (other than to other Members) and shall not disclose such Confidential Information to any Person (other than other Members) and shall take all appropriate steps to safeguard such information and to protect it against disclosure, misuse, espionage, loss and theft.

12.1.2. Nothing contained in Section 12.1.1 shall prevent any Member from disclosing Confidential Information: (i) upon the order of any court or administrative agency; (ii) upon the request or demand of any regulatory agency or authority having jurisdiction over such Member; (iii) to the extent compelled by legal process or required pursuant to subpoena; (iv) to the extent necessary in connection with the exercise of any remedy hereunder; (v) to another Member; (vi) to such Member’s Representatives who, in the reasonable judgment of such Member, need to know such Confidential Information and agree to be bound by the provisions of this Section 12.1.2 as if a Member; or (vii) to any potential Permitted Transferee in connection with a proposed Transfer of Member’s Units from that Member, as long as such Transferee agrees to be bound by the provisions of this Section 12.1.2 as if a Member; provided, that in the case of clause (i), (ii) or (iii), that Member shall notify the Company and other Members of the proposed disclosure as far in advance of such disclosure as practicable (but in no event make any such disclosure before notifying the Company and other Members) and use reasonable efforts to ensure that any Confidential Information so disclosed is accorded confidential treatment satisfactory to the Company, when and if available.

12.1.3. The restrictions of Section 12.1.1 shall not apply to Confidential Information that: (i) is or becomes generally available to the public other than as a result of a disclosure by a Member in violation of this Agreement; (ii) is or has been independently developed or conceived by such Member without use of Confidential Information and not in breach of this Agreement or applicable law; or (iii) becomes available to such Member or any of its Representatives on a non-confidential basis from a source other than the Company, the other Member or any of their respective Representatives not in breach of this Agreement or applicable law provided, that such source is not known by the receiving Member to be bound by a confidentiality agreement regarding the Company.

12.1.4. The obligations of each Member under this Section 12.1 shall survive for two years after (i) the termination, dissolution, liquidation and winding up of the Company, (ii) the withdrawal of such Member from the Company, or (iii) such Member’s Transfer of its Membership Interests.

12.2.1. To Members or Managers. Any notice required to be given to a Manager or to a Member under the provisions of this Agreement or by the Act shall be given either personally or by sending a copy thereof:

12.2.1.1. by first-class or express mail, postage prepaid, or courier service, charges prepaid, to the postal address or street address of the Person appearing on the books of the Company. Notice pursuant to this paragraph shall be deemed to have been given to the Person entitled thereto when deposited in the United States mail or with a courier service for delivery to that Person; or

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

12.2.2. To the Company. Any notice to the Company or the Board of Managers may be given in any manner described in Section 12.2.1 of this Agreement, but shall not be deemed to have been given to the Company unless it is actually received at the principal place of business of the Company.

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

12.4. Amendment. This Agreement or the Certificate may be amended from time to time only with the approval of the Board of Managers and by the vote of the Members at any meeting of the Members, subject to Section 6.9 and any other relevant provision of this Agreement. In any event, no action may be taken to increase any commitment or liability of a Member without first obtaining that Member’s written consent.

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

12.6. Governing Law. Pennsylvania law governs this Agreement and all proceedings arising out of it, without regard to conflicts of law principles.

12.7. Submission to Jurisdiction. If any party brings against any other party any proceeding arising out of this Agreement or ownership of any Unit or Membership Interest, or the management
or operation of the Company, that party may bring that proceeding only in the United States District Court for the Western District of Pennsylvania or, only if there is no federal subject matter jurisdiction, in any state court of Pennsylvania sitting in Pittsburgh, Pennsylvania and each party hereby submits to the exclusive jurisdiction of those courts for purposes of any such proceeding.

12.8. **Waiver of Jury Trial.** Each Party shall not demand a trial by jury.

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

12.10. **Construction.** Whenever the context requires, the gender of any word used in this Agreement includes the masculine, feminine, or neuter, and the number of any word includes the singular or plural. All references to articles and Sections refer to articles and Sections of this Agreement, and all references to schedules are to schedules attached hereto, each of which is made a part hereof for all purposes. The headings in this Agreement are for convenience only; they do not form a part of this Agreement and shall not affect its interpretation.

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

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

[Signature Page Follows]
IN WITNESS WHEREOF, the Member of the Company has caused this Agreement to be executed as of the day and year first above written.

MEMBER:

KEYSTONE GROUP OF COMPANIES, LLC:

BY: FREQUENCY MANAGEMENT, LLC:

By: Russell L. Cersosimo, Jr., Member

By: Thomas Perko, Member

THE ENTRUST GROUP INC. FBO JOHN WILLIAM BOOKWALTER III IRA #7230001572

By:

Read and Accepted By:

John William Bookwalter III, Account Holder

Date:

ELDER1, INC.

By: Daniel F. Stokes
Title: President

SHARON C. ROHR
IN WITNESS WHEREOF, the Member of the Company has caused this Agreement to be executed as of the day and year first above written.

MEMBER:

KEYSTONE GROUP OF COMPANIES LLC:

By: Russell L. Cersosimo, Jr., Member

By: Thomas Perko, Member

THE ENTRUST GROUP INC. FBO JOHN WILLIAM BOOKWALTER III IRA #7230001572

BY: Cecilia Guerra

ITS: AUTHORIZED SIGNER

By: Guerra 1/23/17

Read and Accepted By:

John William Bookwalter III, Account Holder

Date: 1/7/14

ELDER1, INC.

By: Daniel F. Stokes
Title: President

SHARON C. ROHR

Signature Page to Amended and Restated Operating Agreement of Keystone Integrated Care, LLC
IN WITNESS WHEREOF, the Member of the Company has caused this Agreement to be executed as of the day and year first above written.

MEMBER:

KEYSTONE GROUP OF COMPANIES LLC:

By: Russell L. Cersosimo, Jr., Member

By: Thomas Perko, Member

THE ENTRUST GROUP INC. FBO JOHN WILLIAM BOOKWALTER III IRA #7230001572

By:

Read and Accepted By:

John William Bookwalter III, Account Holder

Date:

ELDER1, INC.

By: Daniel F. Stokes
Title: President

SHARON C. ROHR
IN WITNESS WHEREOF, the Member of the Company has caused this Agreement to be executed as of the day and year first above written.

MEMBER:

KEYSTONE GROUP OF COMPANIES LLC:

By: Russell L. Cersosimo, Jr., Member

By: Thomas Perko, Member

THE ENTRUST GROUP INC. FBO JOHN WILLIAM BOOKWALTER III IRA #7230001572

By:

Read and Accepted By:

John William Bookwalter III, Account Holder

Date:

ELDER1, INC.

By: Daniel F. Stokes
Title: President

SHARON C. ROHR

Signature Page to Amended and Restated Operating Agreement of Keystone Integrated Care, LLC
IN WITNESS WHEREOF, the Member of the Company has caused this Agreement to be executed as of the day and year first above written.

MEMBER:

KEYSTONE GROUP OF COMPANIES LLC:

By: Russell L. Cersosimo, Jr., Member

By: Thomas Perko, Member

THE ENTRUST GROUP INC. FBO JOHN WILLIAM BOOKWALTER III IRA #7230001572

By:

Read and Accepted By:

John William Bookwalter III, Account Holder

Date:

ELDER1, INC.

By: Daniel F. Stokes
Title: President

SHARON C. ROHR

DR. JAMES BRADLEY as Trustee

[Signature]
Exhibit C

Form of
COUNTERPART SIGNATURE PAGE
TO SECOND AMENDED AND RESTATED
OPERATING AGREEMENT OF
KEYSTONE INTEGRATED CARE, LLC

By execution of this Counterpart Signature Page to the Second Amended and Restated Operating Agreement of Keystone Integrated, LLC, as may be further amended from time to time (the "Operating Agreement"), by and among Keystone Integrated Care, LLC, a Pennsylvania limited liability (the "Company") and the parties identified therein, the undersigned does hereby agree as of the date first written below to become a party to and to be bound by the provisions of the Operating Agreement to which this Counterpart Signature Page is appended, a copy of which has been furnished to the undersigned. Upon such execution and delivery, the undersigned shall be deemed to be a "Member" under the Operating Agreement, with all of the rights and obligations thereof.

The undersigned hereby authorizes the Company to append this Counterpart Signature Page to the Operating Agreement as evidence thereof.

MEMBER

Date: 2-20-2017

By: ____________________________

_______________________________
Printed Name

_______________________________
Member

Title
# SCHEDULE A

## MEMBERS SCHEDULE

**Date:** February 24, 2017

<table>
<thead>
<tr>
<th>Name and Address of Each Member</th>
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<tr>
<td>Keystone Group of Companies LLC</td>
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<td>The Entrust Group Inc. fbo John William Bookwalter, III</td>
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<tr>
<td>Sharon C. Rohr</td>
<td>DOH REDACTED</td>
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<tr>
<td>James Bradley, M.D.</td>
<td>DOH REDACTED</td>
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<tr>
<td>Elder1, Inc.</td>
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</tr>
<tr>
<td>Stephen D’Achillie</td>
<td>DOH REDACTED</td>
</tr>
</tbody>
</table>
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 legal business formation documents: Keystone Integrated Care, LLC

Trade names and DBA (doing business as) names: N/A

Principal Business Address: 5513 William Flynn Hwy, Suite 400, #230
City: Gibsonia  State: PA  Zip Code: 15044
Phone: 844-563-2837  Fax: N/A  Email: info@ki.care
# Table of Contents

**DOH Cover Sheet**

1

**Table of Contents**

2

**303 East Pittsburgh Street, Greensburg, PA.**

- Westmoreland County Land Bank Purchase & Sale Agreement

3

**307 East Pittsburgh Street, Greensburg, PA.**

- Kenneth D. Jones Purchase & Sale Agreement

7
- Kenneth D. Jones Purchase & Sale Agreement – Signature Page

23

**5200 Harrison Street, Lawrenceville, PA**

- Performance Lighting Rentals Purchase & Sale Agreement

24
- Performance Lighting Rentals Purchase & Sale Agreement – Signature Page

39

**21181 US Route 19, Cranberry Township, PA.**

- Mashuda Enterprises, LP Purchase & Sale Agreement

40
Affidavit of Business History

State of Pennsylvania                        )
) ss:
County of Allegheny        )

The undersigned, Thomas Perko hereby certifies the following:

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

<table>
<thead>
<tr>
<th>Name of individual</th>
<th>Role (principal, operator, financial backer or employee)</th>
<th>Business name and address</th>
<th>Position of management or ownership of a controlling interest</th>
<th>Dates</th>
</tr>
</thead>
</table>
| Brooke Ellen Gehring | Operator                                                  | 1. FGS, Inc - 5775 E 39th Ave, Denver, CO 80207  
2. Colorado 7 Investment, LLC - 5775 E 39th Ave, Denver, CO 80207  
3. Patients Choice of Colorado, LLC - 2251 South Broadway, Denver, CO 80210  
5. Live Green Consulting, LLC - 4000 Morrison Road, Denver, CO 80219  
6. Vireo Health, LLC - 207 South 9th St, Minneapolis, MN 55402  
7. Vireo Health, LLC - 207 South 9th St, Minneapolis, MN 55402 | 1. Ownership – Director & CEO  
2. Ownership – Managing Member  
3. Ownership – Managing Member  
4. Ownership – Managing Member  
5. Ownership – Managing Member  
6. Shareholder  
7. Board Member | 1. 01/14 – Present  
2. 07/11 – 01/2014  
3. 06/11 – 01/2014  
4. 12/10 – Present  
5. 08/10 – Present  
6. 11/14 – Present  
7. 11/14 – 05/16 |
| William T Murray III | Operator                                                  | 1. Champlain Valley Dispensary – 70 South Winooski Ave, #284, Burlington, VT 05401  
2. ICC Holding LLC d/b/a Revolution Enterprises – 5100 Main Street 2nd Floor, Downers Grove, IL 60515 | 1. Director of Sales and Business Development  
2. Interim Chief Financial Officer | 1. 09/16 – Present  
2. 11/16 – Present |
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

03/20/2017
Date

Sworn to and subscribed before me this 20th day of March, 2017.

[Signature]
Notary Public

COMMONWEALTH OF PENNSYLVANIA
NOTARIAL SEAL
DEBORAH REEPING
Notary Public
CITY OF PITTSBURGH, ALLEGHENY COUNTY
My Commission Expires Mar 25, 2021

MY COMMISSION EXPIRES: March 25, 2021

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

State of Pennsylvania
County of Allegheny

The undersigned, Thomas Perko hereby certifies the following by checking the boxes below:

**Principal(s):**

- [x] 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):**

- [x] 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):**

- [x] No financial backer(s) listed in this permit application have been convicted of a criminal offense graded higher than a summary offense.
- [ ] One or more financial backer(s) listed in this permit application have been convicted of a criminal offense graded higher than a summary offense.
If one or more financial backer(s) listed in this permit application have been convicted of a criminal offense graded higher than a summary offense, please provide below the name(s) of the financial backer(s) and the offense(s) of which one or more financial backer(s) was convicted.

Name(s): __________________________________________
Offense(s): _______________________________________

Signature of Affiant and Title __________________________
Date ____________

Sworn to and subscribed before me this 20th day of March, 2017.

Notary Public

COMMONWEALTH OF PENNSYLVANIA
NOTARIAL SEAL
DEBORAH REEPING
Notary Public
CITY OF PITTSBURGH, ALLEGHENY COUNTY
My Commission Expires Mar 25, 2021

A photocopy, facsimile or other electronic version of this document shall be accepted as an original signature.
ATTACHMENT I-2: AFFIDAVIT OF CAPITAL SUFFICIENCY FOR A DISPENSARY PERMIT APPLICANT

COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF HEALTH

AFFIDAVIT OF CAPITAL SUFFICIENCY

State of Pennsylvania ) )
) ss:
County of Allegheny )

I/WE Thomas Perko

DOH REDACTED

For the following applicant:

Keystone Integrated Care, LLC
NAME OF BUSINESS

5513 William Flynn Suite 400, #230 844-563-2837
ADDRESS PHONE

Gibsonia PA 15044 Allegheny
CITY STATE ZIP CODE COUNTY

hereby certify that the Applicant named has at least $150,000 on deposit with one or more financial institutions:
I hereby certify that I am authorized to execute this affidavit on behalf of the applicant and that the information contained herein is true and correct and that there is no misrepresentation, falsification or omissions in this affidavit. I am further aware that any false or misleading statement or omitted information is punishable under the applicable provisions of 18 Pa. C.S. Ch. 49 (relating to falsification and intimidation).

Signature of Affiant and Title

Sworn to and subscribed before me this 20th day of March, 2017.

COMMONWEALTH OF PENNSYLVANIA

NOTARIAL SEAL

DEBORAH REEPING

Notary Public

CITY OF PITTSBURGH, ALLEGHENY COUNTY

My Commission Expires Mar 25, 2021

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

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

Trade names and DBA (doing business as) names: N/A

Principal Business Address: 5513 William Flynn Hwy, Suite 400, #230
City: Gibsonia State: PA Zip Code: 15044
Phone: 844-563-2837 Fax: N/A Email: info@ki.care
Summary

This attachment includes the required Exit Packaging Labels and Product Inserts and includes examples of detailed exit packaging, patient information, and medical marijuana product and supplier detail label examples.

Table of Contents

Exit Packaging Label with Pennsylvania State Requirements highlighted 3
Exit Packaging - Actual size example 4
Example Exit Packaging rendering 5
Safety Insert - State Requirements (front) 6
Safety Insert - Drug Treatment Centers (back) 7
Example Safety Insert rendering 8
Product Safety Inserts
Includes Drug Treatment Centers by County
RELEASE AUTHORIZATION

TO: ______________________________________

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

FROM: Keystone Integrated Care LLC

Applicant’s Name

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

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

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

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

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

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

4. This Release Authorization extends to the review and copy of any information protected by law or contact from disclosure, privilege or obligation.

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

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

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

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

IN WITNESS WHEREOF, I have executed this Release on this 20th day of March, 2017.

[Signature]
Authorized Signatory

STATE OF PENNSYLVANIA
COUNTY OF ALLEGHENY

On this 20th day of March, 2017, before me, a Notary Public, personally appeared Thomas Perko (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.

[Notary Public Signature]
Notary Public
COMMONWEALTH OF PENNSYLVANIA
NOTARIAL SEAL
DEBORAH REEPING
Notary Public
CITY OF PITTSBURGH, ALLEGHENY COUNTY
My Commission Expires Mar 25, 2021

MY COMMISSION EXPIRES: March 25, 2021

pennsylvania
DEPARTMENT OF HEALTH
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<td><strong>Middle Name:</strong> W</td>
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<td><strong>Middle Name:</strong> Anthony</td>
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<td>First Name: Joseph</td>
<td>Middle Name: Francis</td>
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<td>Occupation: DrPH, MS, RD, LDN – Public Health Professor and Researcher</td>
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<td>Occupation: Founder and Vice President</td>
<td>Title in the applicant’s business: Board Director</td>
</tr>
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<td>First Name: Juan</td>
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<tr>
<td>Occupation: Executive Director and Accountant</td>
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<td>Middle Name: W</td>
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<tr>
<td>Occupation: B.A., M.H.A. – President and Chief Executive Officer</td>
<td>Title in the applicant’s business: Board Director</td>
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<tr>
<td><strong>Name:</strong> Heather</td>
<td><strong>Middle Name:</strong> Lynn</td>
</tr>
<tr>
<td><strong>Occupation:</strong> Managing Director and Business Owner</td>
<td><strong>Title in the applicant’s business:</strong> Human Resources Manager / Board Director</td>
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<tbody>
<tr>
<td><strong>Name:</strong> Kathryn</td>
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<tr>
<td><strong>Occupation:</strong> COO and Director</td>
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<tr>
<td><strong>Also known as:</strong> N/A</td>
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<td><strong>Address Line 1:</strong> DOH REDACTED</td>
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<td><strong>Name:</strong> Brooke</td>
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<tr>
<td><strong>Occupation:</strong> Director of Compliance and Chief Executive Officer</td>
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<td><strong>Name:</strong> Rebecca</td>
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<td><strong>Occupation:</strong> Pharm D and Manager</td>
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<td><strong>Name:</strong> Darwin</td>
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<tr>
<td><strong>Occupation:</strong> Cannabis Scientist and Co-Founder</td>
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### Current Officers (Contd.)

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<tbody>
<tr>
<td><strong>First Name</strong>: Robert</td>
<td><strong>Last Name</strong>: Morgan</td>
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<tr>
<td><strong>Middle Name</strong>: M</td>
<td><strong>Suffix</strong>:</td>
</tr>
<tr>
<td><strong>Occupation</strong>: Health Care Regulatory and Policy Attorney</td>
<td><strong>Title in the applicant’s business</strong>: Chief Compliance Officer</td>
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<td><strong>Also known as</strong>: N/A</td>
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<td><strong>First Name</strong>: William</td>
<td><strong>Last Name</strong>: Murray</td>
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<tr>
<td><strong>Middle Name</strong>: T</td>
<td><strong>Suffix</strong>: III</td>
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<tr>
<td><strong>Occupation</strong>: Investment Banker and Managing Partner</td>
<td><strong>Title in the applicant’s business</strong>: Chief Financial Officer</td>
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<tr>
<td><strong>First Name</strong>: George</td>
<td><strong>Last Name</strong>: Verden</td>
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<tr>
<td><strong>Middle Name</strong>: M</td>
<td><strong>Suffix</strong>:</td>
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<tr>
<td><strong>Occupation</strong>: Owner and Chief Executive Officer of a Strategic Security Consulting Firm / Special Agent</td>
<td><strong>Title in the applicant’s business</strong>: Chief Security Officer</td>
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# Employee Qualifications, Description of Duties and Training

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<td><strong>Financial Backers</strong></td>
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Chief Executive Officer
Chief Financial Officer
Chief Operations Officer
Chief Compliance Officer
Chief Security Officer
Chief Marketing Officer
General Manager
Human Resources Manager
Medical Director
Inventory Manager
Dispensary Manager
Physician, Pharmacist, Physician Assistant and/or Certified Registered Nurse Practitioner
Facility Manager

Employees

Assistant Dispensary Manager
Inventory System Administrator
Patient Coordinator
Patient Counselor
Dispensary Technician

Personnel Training Requirements
Board of Directors

- Ronald Fazio
- Juan Garrett
- Heather Shuker
- Daniel Stokes
- Debbi Linhert
Medical & Research Advisory

Health Policy Advisors
- Dr. Michael Cleary
- Dr. Joseph Robare

Research Advisors
- Dr. Ryan Vandrey
- Dr. Robert Parise
- Dr. J. William Bookwalter

Medical Advisors
- Dr. James Bradley
- Dr. Henry Driscoll
Description of the Duties, Responsibilities and Roles

General Responsibilities

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

Follow standard operating procedures for the various cultivation, processing and administrative activities; clean work areas before and after each use.

Principals

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

Principal: Thomas Perko

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

Duties and Responsibilities:

Planning and Strategy

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

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

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

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

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

**Human Resources**
As the business grows, so do its hiring needs to accommodate more orders and faster growth. The owner(s) needs to identify human resources needs, write job descriptions, screen and interview candidates, train, manage and pay employees.

**Financial Backers**
Investors, mortgagees, bondholders, note holders, or other source of equity, capital or other assets other than a financial institution.

**Financial Backers:**
- John William Bookwalter III
- James Bradley
- Steven Russell D’Achille
- Richard Edward Gammiere, Sr.
Role: Monitor the company’s financial well being and assist the company as requested from management regarding access to capital, deal formation and financial planning.

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

Operators

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

Chief Executive Officer – Brooke Gehring

Superior(s): Board of Advisors

Job Description: The CEO is responsible for providing strategic leadership for the company by working with the Board and other management to establish long-range goals, strategies, plans and policies. This is a full-time position, and regularly requires long hours and frequent weekend work. This position manages the senior executive team and is responsible for the performance management and input regarding hiring of senior-level management.

Duties and Responsibilities:
- Plan, develop, organize, implement, direct and evaluate the organization’s fiscal function and performance.
- Participate in the development of the corporation’s plans and programs as a strategic partner.
• Evaluate and advise on the impact of long range planning, introduction of new programs/strategies and regulatory action.
• Develop credibility for the finance group by providing timely and accurate analysis of budgets, financial reports and financial trends in order to assist the Board and senior executives in performing their responsibilities.
• Enhance and/or develop, implement and enforce policies and procedures of the organization by way of systems that will improve the overall operation and effectiveness of the corporation.
• Establish credibility throughout the organization and with the Board as an effective developer of solutions to business challenges.
• Provide technical financial advice and knowledge to others within the financial discipline.
• Improve the budgeting process on a continual basis through education of department managers on financial issues impacting their budgets.
• Provide strategic financial input and leadership on decision making issues affecting the organization; i.e., evaluation of potential alliances acquisitions and/or mergers and pension funds and investments.
• Optimize the handling of bank and deposit relationships and initiate appropriate strategies to enhance cash position.
• Develop a reliable cash flow projection process and reporting mechanism, which includes minimum cash threshold to meet operating needs.
• Act as an advisor from the financial perspective on any contracts into which the Corporation may enter.

Evaluate the finance division structure and team plan for continual improvement of the efficiency and effectiveness of the group as well as providing individuals with professional and personal growth with emphasis on opportunities (where possible) of individuals.

Chief Financial Officer – William T. Murray

Superior: Chief Executive Officer

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

Duties and Responsibilities:

• Plan, develop, organize, implement, direct and evaluate the organization’s fiscal function and performance.
• Participate in the development of the corporation’s plans and programs as a strategic partner.
Chief Operations Officer – Thomas Perko

Superior: Chief Executive Officer

Job Description: The chief operating officer position provides the leadership, management and vision necessary to ensure that the company has the proper operational controls, administrative and reporting procedures, and people systems in place to effectively grow the organization and to ensure financial strength and operating efficiency. The position accomplishes this through a respectful, constructive and energetic style, guided by the objectives of the company. This position has overall supervisory responsibility for all corporate operations. This position regularly requires long hours and frequent weekend work.

Duties and Responsibilities:

- Provide day-to-day leadership and management to a service organization that mirrors the adopted mission and core values of the company. Bottom line: Build a beautiful company.
- Responsible for driving the company to achieve and surpass sales, profitability, cash flow and business goals and objectives.
• Responsible for the measurement and effectiveness of all processes internal and external.
• Provides timely, accurate and complete reports on the operating condition of the company.
• Spearhead the development, communication and implementation of effective growth strategies and processes.
• Collaborate with the management team to develop and implement plans for the operational infrastructure of systems, processes, and personnel designed to accommodate the rapid growth objectives of our organization.
• Motivate and lead a high performance management team; attract, recruit and retain required members of the executive team not currently in place; provide mentoring as a cornerstone to the management career development program.
• Act as lead “client-care officer” through direct contact with every client and partner.
• Assist, as required, in raising additional capital at appropriate valuations to enable the company to meet sales, growth, and market share objectives.
• Foster a success-oriented, accountable environment within the company.

Represent the firm with clients, investors, and business partners.

Chief Compliance Officer – Robert Morgan

Superior: Chief Executive Officer

Job Description: Responsible for regulatory compliance with Commonwealth medical marijuana law, as well as municipal regulations applicable throughout all of the company's locations and operations. Verify and maintain software and technology is in place to adequately provide oversight, security, and monitoring in all required areas. Advise internal management on the implementation or operation of compliance programs. Monitor compliance systems, policies, and procedures to ensure their effectiveness. File appropriate compliance reports with regulatory agencies and coordinate with the company accountant to collect and file taxes for all for all of the company's entities.

Duties and Responsibilities:

Compliance
• Keep informed regarding pending industry changes, trends, and best practices and assess the potential impact of these changes on organizational processes.
• Report violations of compliance or regulatory standards to duly authorized enforcement agencies as appropriate or required.
• Verify that software technology is in place to adequately provide oversight and monitoring in all required areas.
• Oversee internal reporting systems such as waste disposal, changes in employee information, and patient records.
• Review communications such as advertising, signs, and labels to ensure there are no violations of standards or regulations.
• Review or modify policies or operating guidelines to comply with changes in standards or regulations.
• Conduct or direct the internal investigation of compliance issues.

**Compliance Program Management**
• Direct the development or implementation of compliance-related policies and procedures throughout an organization.
• Advise internal management or business partners on the implementation or operation of compliance programs.
• Provide assistance to internal or external auditors in compliance reviews.
• Monitor compliance systems to ensure their effectiveness.
• Design or implement improvements in communication, monitoring, or enforcement of compliance standards.
• Direct environmental programs, such as air or water compliance, aboveground or underground storage tanks, spill prevention or control, hazardous waste or materials management, solid waste recycling, medical waste management, indoor air quality, integrated pest management, employee training, or disaster preparedness.
• Provide employee training on compliance related topics, policies, or procedures.
• Prepare management reports regarding compliance operations and progress.

**Reporting and Documentation**
• File appropriate compliance reports with regulatory agencies.
• Maintain documentation of compliance activities, such as applications and reports submitted, complaints received, or investigation outcomes.
• Coordinate with the company accountant to collect, reconcile, and file taxes for each of the company's entities.
• Prepare patient and caregiver online and pre-orders.
• Provide deliveries as needed
• Route media calls to the appropriate manager immediately (do not comment unless authorized to do so).
• Assist managers with research, communications, or any other assigned projects/task.
• Comply with the company's current policies and procedures and applicable Commonwealth and local laws.

**Other**
• Serve as a confidential point of contact for employees to communicate with management, seek clarification on issues or dilemmas, or report irregularities.
• Disseminate written policies and procedures related to compliance activities and discuss emerging compliance issues with management or employees.
• Consult with corporate attorneys as necessary to address difficult legal compliance issues.
• Verify that all firm and regulatory policies and procedures have been documented, implemented, and communicated.
• Collaborate with human resources departments to ensure the implementation of consistent disciplinary action strategies in cases of compliance standard violations.
• Assess product, compliance, or operational risks and develop risk management strategies.
• Prepare management reports regarding compliance operations and progress.
• Conduct periodic internal reviews or audits to ensure that compliance procedures are followed.
• Identify compliance issues that require follow-up or investigations and complete a monthly progress report of these issues.
• Conduct or direct the internal investigation of compliance issues.

Chief Security Officer – G. Michael Verden

Superior: Chief Executive Officer

Job Description: The Chief Security Officer is the leader of the corporate/physical security function for the company, and includes responsibility for overall corporate security strategy, security architecture development, and compliance 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, contractors and visitors. The individual must be a results-oriented person who can achieve tangible improvements in the corporate security arena.

Duties and Responsibilities:
• Responsible for all data/information security policies, standards, evaluations, roles, and corporate awareness.
• Work with user and technical groups and Internal Auditors in the development and implementation of a security strategy designed to provide a high level of security over physical facilities and data processing while preserving and enhancing facility and system usability.
• Develop and implement flexible security solutions, dictated by the needs of a hybrid and rapidly evolving decentralized business environment.
• Work closely with corporate executives, business managers, audit and legal counsel to understand corporate requirements related to security and regulatory compliance, and to map those requirements to current security projects.
• Develop, implement, and manage the overall enterprise process for security strategy and associated architecture and engineering standards.
• Develop and implement policies, standards and guidelines related to corporate security.
• Oversee the continuous monitoring and protection of facilities, personnel and information systems.
• Evaluate suspected security breaches and recommend corrective actions (including incidents involving outside vendors).
• Serve as the enterprise focal point for security incident response planning and execution.
• Define and implement an ongoing Risk Assessment program, which will define, identify, and classify critical assets, assess threats and vulnerabilities regarding those assets, and implement safeguard recommendations.
• Assist Internal Audits in the development of appropriate criteria needed to assess the level of new/existing applications and/or technology infrastructure elements for compliance with enterprise security standards.
• Establish and monitor formal certification programs regarding enterprise security standards relating to the planned acquisition and/or procurement of new applications or technologies.
• Assist in the review of applications and/or technology environments during the development or acquisitions process to (a) assure compliance with corporate security policies and directions and (b) assist in the overall integration process regarding the company’s own technology environment.
• Oversee the development of, and be the enterprise champion of, a corporate security awareness and training program.
• Manage security functions related to corporate information systems or data centers, working closely with the VP of information security.
• Evaluate changes to the corporate environment for security impact and present findings to management.

• Reporting
  ▪ Report directly to executive management and will serve on the Executive Planning Council.
  ▪ Maintain reports including an administrative assistant, the manager of security architecture and engineering, and various other staff.
  ▪ Generate reports for internal and external auditing purposes.

**Chief Marketing Officer – Kathryn Battista**

**Superior:** Chief Executive Officer

**Job Description:** Responsible for planning, development and implementation of all of the company’s marketing strategies, marketing communications, and public relations activities, both external and internal. The position reports to the Medical Director and participates with the other management staff in charting the direction of the company, assuring its accountability to all constituencies, and ensuring its effective operation. This position has primary working relationships with the senior management team, staff of the marketing and communication function, and the service providers, as well as with the media, marketing representatives, and community organizations.

**Duties and Responsibilities:**

**Marketing and Social Media**
• Maintains and develops social media sites, website content and design, advertisements, newsletters, and any other marketing materials for the company.
• Coordinate media interest in the company and ensure regular contact with target media and appropriate response to media requests.
• Oversees development and implementation of support materials and services for programs and chapters in the area of marketing, communications, and public relations.

**Communications**
• Act as the Organization’s representative with the media and press.
• Coordinate media interest in the Organization and ensure regular contact with target media and appropriate response to media requests.
• Direct the development or implementation of compliance-related policies and procedures throughout an organization.

**Community Outreach**
• Effectively enable volunteers and staff so they can take action on behalf of the company by transmitting the company’s values, vision and direction;
• Engage people in the mission of the company; respecting and using the skills, expertise, experience and insights of people;
• Provide direction and resources, removing barriers and helping develop people’s skills
• Articulate expectations and clarifying roles and relationships.
• Anticipate conflicts and facilitate resolutions, ensuring quality decision-making.

**Other**
• Respond to inquiries concerning the company specials, employment, press and media.
• Serve as a community outreach representative to plan and coordinate the company involvement in community and industry events and programs.
• Monitor market trends to ensure the company’s relevance in methods of communication and marketing, and respond to industry and market changes.
• Keep informed of developments in the fields of marketing, communications and public relations, not-for-profit management and governance, as well as industry regulations.
• Develop and coordinate means to seek regular input from the Organization’s key constituencies regarding the quality of programs and services and the company’s relevance.
• Develop, implement, and monitor systems and procedures necessary to the smooth operation of the marketing/communications/public relations function.
• Design and distribute monthly newsletter to patients, community organizations, and industry contacts.
• Develop, coordinate, and oversee programs, technical assistance and resource materials to assist community chapters and programs in the marketing, communications and positioning of their activities.

**Head Pharmacist/General Manager – Rebecca McCaskey**

**Superior(s):** Executive Management/Board of Directors

**Job Description:** Serves as the executive director of the company and, in partnership with the Board of Directors, is responsible for the success of the company. Together, the Board and General Manager assure the company’s relevance to the community, the accomplishment of the company’s mission and vision, and the accountability of the company to its diverse constituents.
Duties and Responsibilities:

- Overseeing the operation of each of the company’s dispensaries, managers, and technicians. The Board delegates responsibility for management and day-to-day operations to the General Manager, who then has the authority to carry out these responsibilities, in accordance with the direction and policies established by the Board.
- Providing the direction and means to the Board as it carries out its governance functions.
- Assuring the filing of all legal and regulatory documents and monitors compliance with relevant Commonwealth and local laws and regulations.

**Mission, policy and planning**

- Assists the Board in determining the company’s values, mission, vision, and short- and long-term goals.
- Assists the Board in monitoring and evaluating the company’s relevancy to the community, its effectiveness, and its results.
- Keeps the Board fully informed on the condition of the company and on all the important influential factors.
- Identifies problems and opportunities and addresses them; brings those appropriate to the Board and/or its committees; and, facilitates discussion and deliberation.
- Informs the Board and its committees about trends, issues, problems and activities in order to facilitate policy-making. Recommends policy positions.
- Keeps informed of developments in human services, not-for-profit management and governance, philanthropy and fund development.

**Management and administration**

- Provides general oversight of all the company activities, manages the day-to-day operations, and assures a smoothly functioning, efficient organization.
- Assures program quality and organizational stability through development and implementation of standards and controls, systems and procedures, and regular evaluation.
- Assures a work environment that recruits, retains and supports quality staff and volunteers and maintains a process for selecting, development, motivating, and evaluating staff and volunteers.
- Recommends staffing and financing to the Board of Directors. In accordance with Board action, recruits personnel, negotiates professional contracts, and sees that appropriate salary structures are developed and maintained.
- Specifies accountabilities for management personnel and evaluates performance regularly.

**Governance**

- Helps the Board articulate its own role and accountabilities and that of its committees and individual members, and helps evaluate performance regularly.
- Works with the Board President/Chair to enable the Board to fulfill its governance functions and facilitates the optimum performance by the Board, its committees and individual Board members.
- With the Board President/Chair, focuses Board attention on long-range strategic issues.
• Manages the Board’s due diligence process to assure timely attention to core issues.
• Works with the Board officers and committee chairs to get the best thinking and involvement of each Board member and to stimulate each Board member to give his or her best.
• Recommends volunteers to participate in the Board and its committees.

**Financing**
• Promotes programs and services that are produced in a cost-effective manner, employing economy while maintaining an acceptable level of quality.
• Oversees the fiscal activities of the organization including budgeting, reporting and audit.
• Works with Board to ensure financing to support short- and long-term goals.

**Community relations**
• Facilitates the integration of the company into the fabric of the community by using effective marketing and communications activities.
• Acts as an advocate, within the public and private sectors, for issues relevant to the company, its services and constituencies.
• Listens to clients, volunteers, donors and the community in order to improve services and generate community involvement. Assures community awareness of the company’s response to community needs.
• Serves as chief spokesperson for the company, assuring proper representation of the company to the community.
• Initiates, develops, and maintains cooperative relationships with key constituencies.
• Works with legislators, regulatory agencies, volunteers and representatives of the not-for-profit sector to promote legislative and regulatory policies that encourage a healthy community and address the issues of the company’s constituencies.

• Promptly address any issues that arise between the company and any regulatory body, landlords, neighbors, community groups, and/or staff members.
• Check-in and collaborate with administration and management team.
• Manage the important and influential factors affecting the company.
• Ensure adherence to all contracts and compliance in all appropriate areas.
• Attend all Board meetings.
• Maintain close contact with funding managers and appropriate staff of funding bodies.
• Work closely with an accountant to develop budgets, oversee expenditure, and assist with financial reports and acquittals.
• Keep current list of contacts of changing staff in member and prospective member organizations, as well as appropriate government and business contacts.
• Create a Strategic Activity Report for the Board.
• Perform and comply with internal and external audits.
**Human Resources Manager – Heather Shuker**

**Supervisor:** General Manager

**Job Description:** The Human Resources Manager is responsible for the administration and management of all human resource and compliance activities of the company in accordance with all Commonwealth laws, local laws and standards set by the company. The Human Resources Manager provides support for all the company employees, including human resource materials and records, acquisition and termination materials and records, training materials and records, policy and procedure updates, and industry compliance updates. The Human Resources Manager is responsible for administrating and maintaining timely and accurate records of all human resource and compliance activities.

**Duties and Responsibilities:**

**Human Resources Management**
- Responsible for the administration and management of all employee files, including acquisition, evaluation, maintenance and termination.
- Responsible for providing human resource materials to employees and submitting completed documentation to the appropriate recipient.

**Compliance Management**
- Ensures all licenses and permits for the company are current and in compliance with all Commonwealth and local laws.
- Administers all license and permit renewals in a timely fashion, ensures proper posting of all licenses and permits, and ensures all licenses and permits are current.
- Ensures all documentation and reports are in good standing with the Secretary of Commonwealth.
- Serves as a resource for all employees concerning human resources, policies and procedures, industry news, and regulations.
- Coordinates with the General Manager and Executive Management Team to ensure accurate information is communicated to all employees.

**Recordkeeping and Documentation**
- Maintains accurate records of all the company human resources and compliance activities in accordance with the Department and standards set by the company.

**Medical Director**

**Supervisor:** General Manager

**Job Description:** Provides oversight and support to help maintain and continuously improve the quality of care provided to the company’s qualified and registered patients and caregivers. The Medical Director facilitates education and training activities of Dispensary registered agents and identifies and suggests topics for training through observation and evaluation of patient care. The Medical Director develops, organizes, and facilitates education programs for patients, caregivers, board members, and the
community at large concerning methods of consumption, cannabinoid profiles, regulation updates, as well as company services and programs. The Medical Director participates in the monitoring of the company’s quality assurance program, anticipates and plans for change and meets Commonwealth and local compliance requirements.

Duties and Responsibilities:

**Staff, Patient, and Caregiver Education**
- Serves as a resource for information about medical marijuana and ancillary subjects and shares educational resources (books, periodicals, articles) with the company and qualified registered patients and caregivers.
- Assists in developing mechanisms for ensuring a regular flow of educational materials to internal and external audiences.
- Promotes their professional development through self-directed and continuing education.

**Community Integration**
- Develops and organizes community integration events.
- Encourages and facilitates community involvement in the community outreach and integration activities of the company.
- Articulate the company's long-term mission to the community and assists the community in achieving a realistic understanding of the company's capabilities and services.
- Acts as a community advocate for the company.

**Management and Administration**
- Coordinates with administration to monitor the company’s quality assurance program.
- Participates in the development and periodic evaluation of policies and procedures and reviews the policies and procedures manual quarterly.
- Ensures company staff is properly trained and informed with changes in policies and procedures, and provides training when necessary.
- Participates in disciplinary actions of the organization when appropriate.
- Organizes, coordinates, and monitors the activities of the company and ensures that the quality and appropriateness of services meets company, regulatory and community standards.

**Social, Regulatory, Political, and Economic Factors**
- Acquires an understanding of municipal, county, Commonwealth, and federal regulations related to the company’s operations and provides feedback to legislators, policy makers, and local decision makers on existing and proposed rules and regulations.
- Acquires, maintains, and applies knowledge of social, regulatory, political, and economic factors that relate to patient care services.
- Participates in the company budget process to assure the availability of resources for educational programs, materials, and functions.
Other
- Provides information and support for company staff concerning medical marijuana and ancillary subjects.
- Attend company board meetings, community organization meetings, and industry networking events.
- Oversee patient and caregiver documentation to ensure company services, products, programs, and educational materials are serving the needs of the patient base.
- Establish and maintain ongoing relationships with key industry leaders, community leaders, as well as government and Department officials to ensure significant developments in the field are identified and monitored.
- Assist in the management of strategic development and implementation of the company’s quality assurance program.

Inventory Manager

Supervisor: General Manager

Job Description: Develop the company’s inventory management strategy with the aim of controlling costs within budgetary limits, generating savings, rationalizing inventory and maximizing available working capital. This position participates with the other management staff in charting the direction of the company, assuring its accountability to all constituencies, and ensuring its effective operation. This position has primary working relationships with the senior management team, staff of the marketing and communication function, and the service providers, as well as the media and community organizations.

Duties and Responsibilities:

Inventory
- Oversees the proper and timely ordering and distribution of all products, merchandise, and office supplies within the facility.
- Organize, manage, and assist in weekly physical inventory counts within the facility.
- Complete inventory procedure using electronic tracking system and respond to any discrepancies by notifying the location’s management and investigating reasons for the discrepancy.

Reporting and Documentation
- Ensures inventory counts are being performed on schedule with acceptable results, and the proper documentation is being executed and filed.
- Responsible for the settlement of all inventory discrepancies and reporting the resolution of such discrepancies.
- Develop monthly summary for General Manager of all inventory discrepancies and how the issues have been resolved and/or mitigated.
Inventory Management Program

- Manage inventory models insuring the right products are distributed to the right medical marijuana organizations.
- Monitor obsolete and non-moving materials and products. Identify and suggest items for disposition. Supervise the handling of products for sale, returned, or discarded.
- Arrange and schedule regular training for the management and agent teams of the company. Conduct on-the-job training as necessary to maintain proficiency in inventory operations for company personnel.
- Establish, maintain, and assess inventory turn & service level goals as well as other KPI's for each location using history, sales plans, vendor criteria, and market trends.

Other

- Coordinate with facility managers to conduct inventory counts, adjustments, returns, and transfers.
- Respond to inventory requests by arranging orders and transportation of products and materials.
- Ensure materials are ready and available for production and cultivation as and when required.
- Ensure incoming product is receipted and managed appropriately according to company procedure.
- Manage and control perpetual inventory stock counting and inventory accuracy checks.
- Write and maintain accurate written procedures for all main inventory control processes and functions.
- Manage control measures to ensure mistakes, inaccuracies and discrepancies are highlighted, addressed and resolved.
- Manage obsolete inventory and make recommendations for liquidation to recover the highest cost.
- Coordinate with the management team to discuss inventory management plans and methods to reduce errors and maximize inventory efficiency.

Dispensary Manager

Supervisor: General Manager

Job Description: The Dispensary Manager is responsible for managing day-to-day operations of the company dispensary in accordance with state and local laws, and standards set by the company. The Dispensary Manager provides support to the Assistant Dispensary Manager, Patient Coordinators, and Patient Consultants, which includes: scheduling, training, providing policy and procedure updates, product information, and keeping updated with industry news. The Dispensary Manager is responsible for maintaining the dispensary sales floor, ordering and receiving all inventory and products, arranging deliveries, and maintaining facility compliance and cleanliness. The Dispensary Manager must maintain a professional appearance, organized work environment and facility appearance.
Duties and Responsibilities:

**Agent Support and Management**
- Responsible for managing dispensary staff, schedules, inventory and patient relations;
- Serves as a role model and resource for dispensary staff concerning products and services, policies and procedures, industry news and changes in regulations;
- Responds to all agent questions, concerns or suggestions and takes action when necessary to resolve conflicts;
- Responsible for delegating tasks to agents in order to maintain a compliant and clean facility; and
- Coordinates with the General Manager to ensure accurate information is communicated to dispensary staff.

**Customer Service**
- Provides superior customer service for vendors, patients and caregivers;
- Responds to all patient complaints, requests, concerns, suggestions and takes action when necessary to resolve conflicts; and
- Oversee orders and deliveries to ensure accurate order information and timeliness of deliveries.

**Reports and Documentation**
- Maintain accurate records of all dispensary activities including patient records, sales, deliveries and returns in accordance with the Commonwealth of Pennsylvania and the standards set by the company;
- Maintain inventory control system and perform daily counts of all marijuana and marijuana products in the facility; and
- Provide regular inventory and sales reports to the General Manager.

**Physician and/or Pharmacist**

**Supervisor(s):** General Manager and Medical Director

**Job Description:** Responsible for patient orientation, data, paperwork, and upkeep. Maintain accurate records of patients identification and registration documents, manage scheduling patient traffic flow, answer phones and respond to patient and caregiver inquiries. Record, arrange, and package patient orders. Maintain an organized environment and facility appearance. This position operates with direct supervision from the Medical Director. Follows established policies and procedures and contributes to the development of new concepts, policies, and procedures as necessary to perform job duties and tasks.
Duties and Responsibilities:

**Customer Service and Recordkeeping**
- Welcome patients and caregivers as they enter the facility. Provide exceptional service for new customers, answering any questions they may have and providing brief orientations and tours when needed.
- Obtain the appropriate documentation from each patient and caregiver at every visit, ensuring validity of their identification and registration with the Commonwealth of Pennsylvania.
- Record each visit using the electronic tracking system, ensuring accuracy of patient and caregiver information, and recording notes if necessary.
- Communicate with dispensary technician to maintain a steady patient traffic flow to maximize sales and customer satisfaction.
- Record and collaborate with the dispensary and transportation agents about preorders and online orders to ensure accurate order information and timeliness of delivery.
- Respond to and resolve patient requests, complaints, or compliments in person, through email, and on the phone requesting supervisor support as needed.
- Maintain organization of desk space and waiting room through daily upkeep and light cleaning.

**Medical Marijuana Education and Guidance:**
- Maintain knowledge of all applicable Commonwealth and local laws, as well as documentation processes in accordance with the Department.
- Maintain a basic understanding of the medicine, products, and services provided by the company.
- Educate patients and caregivers on the processes of registration, renewals, lost registration documents, etc.
- Communicate with patients and caregivers about their personal goals in using medical marijuana and provide educational materials and resources for patients and caregivers as needed.
- Record specific requests, preferences, and notes concerning patient and caregiver registration status using electronic tracking system.
- Maintain awareness of patient input and suggest changes to improve service or product.

**Documentation:**
- Prepare documents as needed to assist patients and caregivers register with the Commonwealth of Pennsylvania Department of Health.
- Ensure all patient and caregiver files are current and required documentation is on file and follows all guidelines issued by the Department.
- Maintain patient database through entering new patients, adding or removing membership, updating changes in information, scheduling appointments and updating patient registration status.
• Maintain caregiver paperwork in accordance with the Department, record information in electronic tracking system and communicating changes to caregivers.
• Communicate with dispensary technician to update online and physical menus as needed.
• Notify dispensary manager of office supply needs and assist management in product inventory and/or adjustments.
• Responsible for outgoing and incoming mail distribution and ensuring post office box is collected weekly.

Other
• Assist with patient and caregiver online and pre-orders, if applicable.
• Assign deliveries as needed and if authorized by the Department.
• Route media calls to the appropriate manager immediately (do not comment unless authorized to do so).
• Assist managers with research, communications, or any other assigned projects/task.
• Comply with company policies and procedures and applicable Commonwealth and local laws.
• Assist in start of day and end of day procedures, initiate all necessary computer programs, organize waiting room, prepare paperwork, etc.
• Communicate with patients and caregivers about their personal goals in using medical marijuana and provide educational materials and resources for patients and caregivers as needed.
• Ensure facility organization and cleanliness by performing light cleaning.
• Assist in follow-up calls to new members, those not seen in 60 days, and expired members.
• Follow-up with patients and caregivers about specific product of service requests.
• Participate in company discussions and provide suggestions for improving product availability, patient and caregiver satisfaction, and/or company policies and procedures.
• Attend staff meetings as scheduled.

Physician Assistant and/or Certified Registered Nurse Practitioner (if applicable)

Supervisor(s): General Manager and Medical Director

Job Description: Same as Physician/Pharmacist

Duties and Responsibilities: Same as Physician/Pharmacist

Facility Manager

Supervisor: General Manager

Job Description: The facility manager works closely with the General Manager and department heads to ensure that the facility is maintained and remains operational.
Duties and Responsibilities:

- Perform daily inspections of the facility to ensure that all systems are operational.
- Perform a variety of general maintenance tasks throughout the garden and facility on an as needed and scheduled basis.
- Perform simple repairs of the facility and equipment.
- Work with a network of plumbers, electricians and HVAC technicians that are available to be called in to resolve issues.
- Provide assistance in the form of labor or tools to other departments on an as needed basis.

Receive and inventory shipments of supplies and maintain a regular shipment schedule.

Employees

Assistant Dispensary Manager

Supervisor: Dispensary Manager

Job Description: The Assistant Manager is responsible for managing day-to-day operations of the company dispensary in accordance with Commonwealth and local laws, and standards set by the company. The Assistant Manager provides support to all Patient Coordinators and Patient Consultants, which includes: scheduling, training, providing policy and procedure updates, product information, and keeping updated with industry news. The Assistant Manager is responsible for maintaining the dispensary sales floor, ordering and receiving all inventory and products, arranging deliveries, and maintaining facility compliance and cleanliness. The Assistant Manager must maintain a professional appearance, organized work environment and facility appearance.

Duties and Responsibilities:

Agent Support and Management

- Responsible for managing dispensary staff, schedules, inventory and patient relations;
- Serves as a role model and resource for dispensary staff concerning products and services, policies and procedures, industry news and changes in regulations;
- Responds to all agent questions, concerns or suggestions and takes action when necessary to resolve conflicts;
- Responsible for delegating tasks to agents in order to maintain a compliant and clean facility; and
- Coordinates with the Dispensary Manager to ensure accurate information is communicated to dispensary staff.

Customer Service

- Provides superior customer service for vendors, patients and caregivers;
- Responds to all patient complaints, requests, concerns, suggestions and takes action when necessary to resolve conflicts; and
• Oversee orders and deliveries to ensure accurate order information and timeliness of deliveries.

**Reports and Documentation**

• Maintain accurate records of all dispensary activities including patient records, sales, deliveries and returns in accordance with the Commonwealth of Pennsylvania and the standards set by the company;
• Maintain inventory control system and perform daily counts of all marijuana and marijuana products in the facility; and
• Provide regular inventory and sales reports to the Dispensary Manager.

**Inventory System Administer**

**Supervisor:** Inventory Manager

**Job Description:** The Inventory System Administrator is responsible for ensuring the inventory management and tracking system [INVENTORY SYSTEM] reflects the real time inventory activities of the company. The Inventory System Administrator must audit all entries, movements, transfers, and other inventory activities on a daily basis and investigate any discrepancies found.

**Duties and Responsibilities:**

**System Maintenance**

• Coordinate with vendors to acquire all required services, equipment, and components for system installation
• Oversee set up and installation
• Issue system user access to employees based on job duties

**Audit**

• Perform regular audits of all inventory activities
• Coordinate with department managers to reconcile inventory
• Notify the General Manager of any discrepancies and methods used to resolve the issue and mitigate occurrences.

**Patient Coordinator**

**Supervisor(s):** Dispensary Manager and General Manager

**Job Description:** The Patient Coordinator is responsible for patient and caregiver orientation, data, paperwork, and upkeep. The Patient Coordinator must maintain accurate records of patient and caregiver identification and registration documents, manage scheduling customer traffic flow, answer phones and respond to customer and caregiver inquiries. The Patient Coordinator must record, arrange, and package patient and caregiver orders. The Patient Coordinator must maintain a professional appearance, organized work environment and facility appearance.
Duties and Responsibilities:

**Customer Service and Recordkeeping**
- Welcome patients as they enter the facility. Provide exceptional service for new and returning patients, answering any questions they may have and providing brief orientations when needed;
- Obtain the appropriate documentation from each patient and caregiver at every visit, ensuring validity of his or her identification and registration with the Commonwealth;
- Record each visit using the patient management software, ensuring accuracy of customer and caregiver information, and recording notes if necessary;
- Communicate with Patient Counselors to maintain a steady customer traffic flow to maximize sales and customer satisfaction;
- Record and collaborate with the Patient Counselors about pre orders and online orders to ensure accurate order information and timeliness of pick-up;
- Respond to and resolve customer requests, complaints, or compliments in person, through email, and on the phone requesting supervisor support as needed; and
- Maintain organization of records, desk space and waiting room through daily upkeep and light cleaning.

**Medical Marijuana Education and Guidance**
- Maintain knowledge of all applicable Commonwealth and local laws, as well as documentation processes in accordance with the Commonwealth of Pennsylvania;
- Maintain a basic understanding of the medicine, products, and services provided at the company;
- Educate customers on the processes of registration, renewals, lost registration documents, etc.;
- Communicate with customers about their personal goals in using customer marijuana and provide educational materials and resources for customers as needed;
- Record specific requests, preferences, and notes concerning customer and caregiver registration status using the patient management software; and
- Maintain awareness of customer input and suggest changes to improve service or product.

**Documentation**
- Prepare documents as needed to assist customers’ register with the Commonwealth; and
- Ensure all customer and caregiver files are current and required documentation is on file and follows all guidelines issued by the Commonwealth.

**Patient Counselor**

**Supervisor(s):** Dispensary Manager and General Manager

**Job Description:** The Patient Counselor must provide superior customer service and educational guidance to registered patients and caregivers. The Patient Counselor must maintain a thorough
understanding of medical marijuana varieties, derivatives, and infused products based on current offerings in the Commonwealth market and current cannabis science. The Patient Counselor must maintain a professional appearance, organized work environment and facility appearance.

Duties and Responsibilities:

**Customer Service and Facility Upkeep**
- Greet patients and caregivers as they enter the dispensary. Provide orientations and tours for first time patients;
- Communicate with Patient Coordinator to maintain patient traffic flow, minimize wait times, and maximize sales and patient satisfaction;
- Respond to and resolve patient requests, complaints or compliments in person, through email and on the phone requesting supervisor support as needed;
- Maintain organization of sales stations and dispensary through daily upkeep and light cleaning;
- Maintain quality and appearance of product through organization and checking for defective mold, mildew, expiration dates or defective products; and
- Prepare and build patient and caregiver online and pre-orders.

**Medical Marijuana Education and Guidance**
- Maintain knowledge of all medicine, products and services provided, as well as applicable Commonwealth and local laws;
- Educate patients and caregivers on medicating options and methods, strain information, medicine effectiveness for specific ailments and cultivation methods;
- Provide educational materials and resources for patients and caregivers as needed;
- Record specific requests, preferences and notifications for patients and caregivers using the inventory system; and
- Maintain awareness of patient input and suggest changes to improve service or product.

**Processing Transaction**
- Collects payment and process transactions after order verification;
- Applies transaction amount to each customer’s allocated amount in accordance with Commonwealth and local law;
- Packages and labels products appropriately prior to handing to customer; and
- Provides receipt for each transaction.

**Documentation**
- Ensure accurate information is recorded for all patient and caregiver registration, sales and preferences;
- Communicate inventory levels with Assistant Manager(s) to maintain accurate menus and update menus as needed; and
- Coordinate with the General Manager as needed.
Dispensary Technician

Supervisor: Dispensary Manager

Job Description: Perform dispensing processes and procedures related to the distribution, packaging, labeling, sampling and storage of medical marijuana products, conduct day to day maintenance, cleaning and calibration procedures, keep track of relevant data and with proper chain of custody, and other work involving practical application current pharmacy practices, as well as provide superior customer service and educational guidance to registered patients and caregivers. Arrange and package patient orders, record sales in the electronic tracking system, and handle cash, check, and credit card transactions.

Duties and Responsibilities:

Customer Service and Facility Upkeep

- Greet patients and caregivers as they enter the dispensary. Provide orientations and tours for first-time customers.
- Communicate with patient coordinator to maintain patient traffic flow and maximize sales and customer satisfaction.
- Package patient orders while ensuring proper quantity, weight, labeling, and discounts are applied, as well as insert any necessary informational packets.
- Respond to and resolve patient requests, complaints, or compliments in person, through email, and on the phone requesting supervisor support as needed.
- Maintain organization of dispensary and waiting room through daily upkeep and light cleaning.
- Maintain quality and appearance of product by checking for defective, expired, or mislabeled products.

Medical Marijuana Education and Guidance

- Maintain knowledge of all medicine, products, and services provided by the company, as well as applicable Commonwealth and local laws.
- Educate patients and caregivers on medicating options and methods, ratio and dosing information, medicine effectiveness for specific ailments, and growing and processing methods.
- Provide educational materials and resources for patients and caregivers as needed.
- Record specific requests, preferences, and notifications for patients and caregivers using the electronic tracking system.
- Maintain awareness of patient input and suggest changes to improve service or product.

Documentation

- Ensure accurate information is recorded for all patient and caregiver registration, sales, and preferences.
- Communicate inventory levels with patient coordinator to maintain accurate menus and update menus as needed.
• Coordinate with the dispensary manager as needed.
• Prepare patient and caregiver online and pre-orders, if applicable.

Other
• Perform deliveries as needed and if authorized by the Department.
• Route media calls to the appropriate manager immediately (do not comment unless authorized to do so).
• Assist managers with research, communications, or any other assigned projects/task.
• Comply with company policies and procedures and applicable Commonwealth and local laws.
• Assist in start of day and end of day procedures, stock products and supplies, arrange displays, open and close registers, etc.
• Greet and escort patients and caregivers from waiting room to dispensary.
• Provide superior customer service and education to patients and caregivers.
• Notify patient coordinator of inventory levels to ensure accurate menu information.
• Update product menus as necessary.
• Assist management in product inventory and/or adjustments.
• Attend staff meetings as scheduled.
Personnel Qualifications

All Personnel

- Can verify the candidate has a valid and current form of identification such as driver’s license, Commonwealth issued ID, passport or other form satisfactory to the Department. §1141.29 (b)(6)(i).
- Can verify the candidate is of good moral character and reputation in the form of a written statement. §1141.29 (b)(6)(ii) & 1141.29 (b)(14)(i).
- Can provide a valid and current copy of a criminal history records check and fingerprints from the Pennsylvania Commonwealth Police. §1141.29 (b)(6)(iii) & 1141.31 (a).
- Can provide an affidavit setting forth the following: (A) Any position of management or ownership held during the past 10 years of a controlling interest in any other business in this Commonwealth or any other jurisdiction involving the manufacturing or distribution of medical marijuana or a controlled substance; and (B) Whether the principal, operator, financial backer or employee has been convicted of a criminal offense graded higher than a summary offense. §1141.29 (b)(6)(iv).
- Can provide: (i) the names, residential addresses, titles and short version of a curricula vitae of each principal of the corporation or limited liability company, (ii) a certified copy of the filed articles of incorporation of the corporation or filed certificate of organization of the limited liability company, and (iii) unless the corporation or limited liability company is a publicly traded company, the names and mailing addresses of all persons owning securities in the corporation or membership interests in the limited liability company; if the principal, operator or financial backer candidate is a corporation or limited liability company. §1141.29 (b)(7).
- Can provide: (i) the names, residential addresses, titles and short version of a curricula vitae of each partner and general partner of a general partnership, limited partnership, limited liability partnership or limited liability limited partnership, and if any of the partners is a corporation or a limited liability company, the names, residential addresses, titles and short version of a curricula vitae of each principal of that corporation or limited liability company, (ii) a certified copy of its filed certificate of limited partnership or other formation document, if applicable, (iii) a certified copy of its partnership agreement, and (iv) unless the entity is a publicly traded company, the names and mailing addresses of each of its partners; if the principal, operator or financial backer candidate is a general partnership, limited partnership, limited liability partnership or limited liability limited partnership. §1141.29 (b)(8).
- Can provide evidence of any criminal action under the laws of the Commonwealth or any other Commonwealth, the United States or a military, territorial or tribal authority, graded higher than a summary offense, against the candidate, or which involved the possession, transportation or sale of illegal drugs, or which related to the provision of marijuana for medical purposes, including any action against an organization providing marijuana for medical purposes in which the candidate either owned shares of stock or served as an executive, and which resulted in a conviction, guilty
plea or plea of nolo contendere, or an admission of sufficient facts, if applicable. §1141.29 (b)(9)(v).

- Can provide evidence of any civil or administrative action under the laws of the Commonwealth or any other state, the United States or a military, territorial or tribal authority relating to the candidate’s profession, or occupation or fraudulent practices, including fraudulent billing practices, if applicable. §1141.29 (b)(9)(vi).
- Can verify, under penalty of perjury, that the information provided by the candidate is accurate and correct.
- Can verify the candidate is 18 years of age or older. §1151.21 (b)(2).
- Bilingual (English/Spanish) applicants strongly preferred.
- Excellent communication skills and attention to detail.
- Effective time management and ability to multitask.
- Proficiency in Windows based software and point of sale applications.
- Ability to work in a fast-paced, changing and challenging environment.
- Thorough understanding of Commonwealth and local medical marijuana laws and how they apply to the operations of the company.

**General Dispensary**

- **Education:** Candidates must have a minimum of a Bachelor’s degree, preferably in business.
- Candidates must be able to work cohesively as a team with all personnel.
- Candidates must have the ability to function with little to no supervision.
- Candidates must have problem-solving skills, attention to detail, and good communication skills. Ability to analyze information and think critically.
- Candidates must have an aptitude for written and verbal communication. Report writing and data collecting are mandatory.
- Candidates must have strong time management and multi-tasking skills are required.
- Candidates must have the ability to pay attention to details as needed to complete measurements, enter data and to meet quality control requirements.
- Candidates must have the ability to follow standard operating procedures, adapt to changes and become incorporated into established daily routines.
- Candidates must be cannabis friendly and passion about cannabis medicine.

**Principals**

- Can verify the candidate is current in all tax obligations due and owed, and have no outstanding tax obligations, to the Commonwealth. §1141.27 (c)(2).
- Can provide evidence, in the form of tax clearance certificates issued by the Department of Revenue and the Department of Labor and Industry under §1141.27, that the candidate is in compliance with all the laws of the Commonwealth regarding the payment of Commonwealth taxes. §1141.29 (b)(9)(iv).
Financial Backers

- Must be an Accredited Investor as defined by Rule 501(a) of Regulation D, which was promulgated by the U.S. Securities and Exchange Commission.
- Agree with the mission and objectives of the company.

Operators

Chief Executive Officer

- **Education**: a minimum of a Bachelor’s degree in business management or related business field, with a Master’s degree being preferred.
- Candidate must have minimum of 10 years of experience in a position with executive management experience and responsibilities.
- Candidate must have strong contract writing, evaluating and negotiating experience.
- Candidate must also be adapt in the following capacities:
  - Leadership.
  - Strategic Thinking.
  - Business Acumen.
  - Problem Solving/Analysis.
  - Decision Making.
  - Performance Management.
  - Results Driven.
  - Communication Proficiency.
  - Financial Management.

Chief Financial Officer

- **Education**: a minimum of a Bachelor’s degree in investment banking, finance or related business field, with a Master’s degree being preferred.
- Candidate must have the ability to work in a clerical office setting, and experience with standard office equipment such as computers, phones, photocopiers, filing cabinets and fax machines.
- Candidate must have minimum of 10 years of experience in a position with executive management experience and responsibilities.
- Candidate must have strong contract writing, evaluating and negotiating experience.
- Candidate must also be adapt in the following capacities:
  - Leadership.
  - Strategic Thinking.
  - Business Acumen.
  - Problem Solving/Analysis.
  - Decision Making.
- Performance Management.
- Results Driven.
- Communication Proficiency.
- Financial Management.

**Chief Operations Officer**

- **Education:** a minimum of a Bachelor’s degree in business management or related business field, with a Master’s degree being preferred.
- Candidate must have the ability to work in a clerical office setting, and experience with standard office equipment such as computers, phones, photocopiers, filing cabinets and fax machines.
- Candidate must have minimum of 8 years of experience in a position with executive management experience and responsibilities.
- Candidate must have strong contract writing, evaluating and negotiating experience.
- Candidate must demonstrated experience in financial planning and analysis with previous experience overseeing human resources, information technology, and legal.
- Candidate must be skilled in organizational development, personnel management, budget and resource development, and strategic planning.
- Candidate must have excellent people skills, with an ability to partner with a dynamic leadership team.
- Candidate must possess personal qualities of integrity, credibility, and commitment to corporate mission.
- Candidate must be flexible and able to multitask; can work within an ambiguous, fast-moving environment, while also driving toward clarity and solutions; demonstrated resourcefulness in setting priorities and guiding investment in people and systems.

**Chief Executive Officer – Brooke Gehring**

**Superior(s):** Board of Advisors

**Job Description:** The CEO is responsible for providing strategic leadership for the company by working with the Board and other management to establish long-range goals, strategies, plans and policies. This is a full-time position, and regularly requires long hours and frequent weekend work. This position manages the senior executive team and is responsible for the performance management and input regarding hiring of senior-level management.

**Duties and Responsibilities:**

- Plan, develop, organize, implement, direct and evaluate the organization’s fiscal function and performance.
- Participate in the development of the corporation’s plans and programs as a strategic partner.
- Evaluate and advise on the impact of long range planning, introduction of new programs/strategies and regulatory action.
• Develop credibility for the finance group by providing timely and accurate analysis of budgets, financial reports and financial trends in order to assist the Board and senior executives in performing their responsibilities.
• Enhance and/or develop, implement and enforce policies and procedures of the organization by way of systems that will improve the overall operation and effectiveness of the corporation.
• Establish credibility throughout the organization and with the Board as an effective developer of solutions to business challenges.
• Provide technical financial advice and knowledge to others within the financial discipline.
• Improve the budgeting process on a continual basis through education of department managers on financial issues impacting their budgets.
• Provide strategic financial input and leadership on decision making issues affecting the organization; i.e., evaluation of potential alliances acquisitions and/or mergers and pension funds and investments.
• Optimize the handling of bank and deposit relationships and initiate appropriate strategies to enhance cash position.
• Develop a reliable cash flow projection process and reporting mechanism, which includes minimum cash threshold to meet operating needs.
• Act as an advisor from the financial perspective on any contracts into which the Corporation may enter.

Evaluate the finance division structure and team plan for continual improvement of the efficiency and effectiveness of the group as well as providing individuals with professional and personal growth with emphasis on opportunities (where possible) of individuals.

Chief Financial Officer – William T. Murray

Superior: Chief Executive Officer

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

Duties and Responsibilities:
• Plan, develop, organize, implement, direct and evaluate the organization’s fiscal function and performance.
• Participate in the development of the corporation’s plans and programs as a strategic partner.
• Evaluate and advise on the impact of long range planning, introduction of new programs/strategies and regulatory action.
• Develop 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, the Board and other senior executives in performing their responsibilities.
• Enhance and/or develop, implement and enforce policies and procedures of the organization by way of systems that will improve the overall operation and effectiveness of the corporation.
• Establish credibility throughout the organization and with the Board as an effective developer of solutions to business challenges.
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• Be an advisor from the financial perspective on any contracts into which the corporation may enter.

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**Chief Operations Officer – Thomas Perko**

**Superior:** Chief Executive Officer

**Job Description:** The chief operating officer position provides the leadership, management and vision necessary to ensure that the company has the proper operational controls, administrative and reporting procedures, and people systems in place to effectively grow the organization and to ensure financial strength and operating efficiency. The position accomplishes this through a respectful, constructive and energetic style, guided by the objectives of the company. This position has overall supervisory responsibility for all corporate operations. This position regularly requires long hours and frequent weekend work.

**Duties and Responsibilities:**

• Provide day-to-day leadership and management to a service organization that mirrors the adopted mission and core values of the company. Bottom line: Build a beautiful company.
• Responsible for driving the company to achieve and surpass sales, profitability, cash flow and business goals and objectives.
• Responsible for the measurement and effectiveness of all processes internal and external.
• Provides timely, accurate and complete reports on the operating condition of the company.
• Spearhead the development, communication and implementation of effective growth strategies and processes.
• Collaborate with the management team to develop and implement plans for the operational infrastructure of systems, processes, and personnel designed to accommodate the rapid growth objectives of our organization.
• Motivate and lead a high performance management team; attract, recruit and retain required members of the executive team not currently in place; provide mentoring as a cornerstone to the management career development program.
• Act as lead “client-care officer” through direct contact with every client and partner.
• Assist, as required, in raising additional capital at appropriate valuations to enable the company to meet sales, growth, and market share objectives.
• Foster a success-oriented, accountable environment within the company.

Represent the firm with clients, investors, and business partners.

Chief Compliance Officer

• Candidate must have excellent analytical skills and understanding of Commonwealth medical marijuana law.
• Candidate must have the ability to comprehend complex legislature and apply implications on the operations of the company.
• Candidate must have strong communications skills are required as the Compliance Director will be responsible for maintaining dialog and relationships with Commonwealth department officials, law enforcement, landlords, city personnel, as well as the directors, management, and employees of the company.
• Candidate must have at least four years of experience in a position with medical compliance experience and responsibilities.

Chief Security Officer

• **Education:** Candidates must have a minimum of a Bachelor’s degree in some field of law enforcement or security management.
• Candidate must have excellent staff management skills.
• Candidate must have the ability to interface with top management.
• Candidate must have at least eight years of management experience at least five of which were in a security-related area in a leadership capacity.
• Other desired qualities include:
  • Consensus-builder, while still results-oriented and commitment focused.
  • Network-based security experience.
  • Business-based attitude; i.e., the recognition that no policies can be implemented without demonstrable business benefit.
  • Customer service experience.
  • Awareness of and strong experience in:
• Vulnerability testing in addition to penetration testing.
• Developing security practices as a people problem versus a technical problem.
• Standards-based architecture with an understanding of how to get there, including compliance monitoring and enforceability.
• Candidate must have at least 2 years of experience managing the security operations for a medical marijuana organization.

Chief Marketing Officer – Kathryn Battista

• Candidate must have demonstrated skills, knowledge and experience in the design and execution of marketing, communications and public relations activities.
• Candidate must have strong creative, strategic, analytical, organizational and personal sales skills.
• Experience developing and managing budgets, and hiring, training, developing, supervising and appraising personnel.
• Candidate must have demonstrated successful experience writing press releases, making presentations and negotiating with media.
• Experience overseeing the design and production of print materials and publications.
• Candidate must have computer literacy in word processing, data base management and page layout.
• Candidate must have commitment to working with shared leadership and in cross-functional teams.
• Candidate must have strong oral and written communications skills.
• Candidate must have ability to manage multiple projects at a time.
• Candidate must have at least four years of experience in a position with managerial and community outreach responsibilities.

Chief Executive Officer – Brooke Gehring

Superior(s): Board of Advisors

Job Description: The CEO is responsible for providing strategic leadership for the company by working with the Board and other management to establish long-range goals, strategies, plans and policies. This is a full-time position, and regularly requires long hours and frequent weekend work. This position manages the senior executive team and is responsible for the performance management and input regarding hiring of senior-level management.

Duties and Responsibilities:
• Plan, develop, organize, implement, direct and evaluate the organization’s fiscal function and performance.
• Participate in the development of the corporation’s plans and programs as a strategic partner.
• Evaluate and advise on the impact of long range planning, introduction of new programs/strategies and regulatory action.
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• Provide technical financial advice and knowledge to others within the financial discipline.
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Chief Financial Officer – William T. Murray

Superior: Chief Executive Officer

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

Duties and Responsibilities:
• Plan, develop, organize, implement, direct and evaluate the organization’s fiscal function and performance.
• Participate in the development of the corporation’s plans and programs as a strategic partner.
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Chief Operations Officer – Thomas Perko

Superior: Chief Executive Officer

Job Description: The chief operating officer position provides the leadership, management and vision necessary to ensure that the company has the proper operational controls, administrative and reporting procedures, and people systems in place to effectively grow the organization and to ensure financial strength and operating efficiency. The position accomplishes this through a respectful, constructive and energetic style, guided by the objectives of the company. This position has overall supervisory responsibility for all corporate operations. This position regularly requires long hours and frequent weekend work.

Duties and Responsibilities:
• Provide day-to-day leadership and management to a service organization that mirrors the adopted mission and core values of the company. Bottom line: Build a beautiful company.
• Responsible for driving the company to achieve and surpass sales, profitability, cash flow and business goals and objectives.
• Responsible for the measurement and effectiveness of all processes internal and external.
• Provides timely, accurate and complete reports on the operating condition of the company.
• Spearhead the development, communication and implementation of effective growth strategies and processes.
• Collaborate with the management team to develop and implement plans for the operational infrastructure of systems, processes, and personnel designed to accommodate the rapid growth objectives of our organization.
• Motivate and lead a high performance management team; attract, recruit and retain required members of the executive team not currently in place; provide mentoring as a cornerstone to the management career development program.
• Act as lead “client-care officer” through direct contact with every client and partner.
• Assist, as required, in raising additional capital at appropriate valuations to enable the company to meet sales, growth, and market share objectives.
• Foster a success-oriented, accountable environment within the company.

Represent the firm with clients, investors, and business partners.

**Chief Compliance Officer – Robert Morgan**

**Superior:** Chief Executive Officer

**Job Description:** Responsible for regulatory compliance with Commonwealth medical marijuana law, as well as municipal regulations applicable throughout all of the company's locations and operations. Verify and maintain software and technology is in place to adequately provide oversight, security, and monitoring in all required areas. Advise internal management on the implementation or operation of compliance programs. Monitor compliance systems, policies, and procedures to ensure their effectiveness. File appropriate compliance reports with regulatory agencies and coordinate with the company accountant to collect and file taxes for all for all of the company's entities.

**Duties and Responsibilities:**

**Compliance**

• Keep informed regarding pending industry changes, trends, and best practices and assess the potential impact of these changes on organizational processes.
• Report violations of compliance or regulatory standards to duly authorized enforcement agencies as appropriate or required.
• Verify that software technology is in place to adequately provide oversight and monitoring in all required areas.
• Oversee internal reporting systems such as waste disposal, changes in employee information, and patient records.
• Review communications such as advertising, signs, and labels to ensure there are no violations of standards or regulations.
• Review or modify policies or operating guidelines to comply with changes in standards or regulations.
• Conduct or direct the internal investigation of compliance issues.
Compliance Program Management

• Direct the development or implementation of compliance-related policies and procedures throughout an organization.
• Advise internal management or business partners on the implementation or operation of compliance programs.
• Provide assistance to internal or external auditors in compliance reviews.
• Monitor compliance systems to ensure their effectiveness.
• Design or implement improvements in communication, monitoring, or enforcement of compliance standards.
• Direct environmental programs, such as air or water compliance, aboveground or underground storage tanks, spill prevention or control, hazardous waste or materials management, solid waste recycling, medical waste management, indoor air quality, integrated pest management, employee training, or disaster preparedness.
• Provide employee training on compliance related topics, policies, or procedures.
• Prepare management reports regarding compliance operations and progress.

Reporting and Documentation

• File appropriate compliance reports with regulatory agencies.
• Maintain documentation of compliance activities, such as applications and reports submitted, complaints received, or investigation outcomes.
• Coordinate with the company accountant to collect, reconcile, and file taxes for each of the company's entities.
• Prepare patient and caregiver online and pre-orders.
• Provide deliveries as needed
• Route media calls to the appropriate manager immediately (do not comment unless authorized to do so).
• Assist managers with research, communications, or any other assigned projects/task.
• Comply with the company's current policies and procedures and applicable Commonwealth and local laws.

Other

• Serve as a confidential point of contact for employees to communicate with management, seek clarification on issues or dilemmas, or report irregularities.
• Disseminate written policies and procedures related to compliance activities and discuss emerging compliance issues with management or employees.
• Consult with corporate attorneys as necessary to address difficult legal compliance issues.
• Verify that all firm and regulatory policies and procedures have been documented, implemented, and communicated.
• Collaborate with human resources departments to ensure the implementation of consistent disciplinary action strategies in cases of compliance standard violations.
• Assess product, compliance, or operational risks and develop risk management strategies.
• Prepare management reports regarding compliance operations and progress.
Chief Security Officer – G. Michael Verden

Superior: Chief Executive Officer

Job Description: The Chief Security Officer is the leader of the corporate/physical security function for the company, and includes responsibility for overall corporate security strategy, security architecture development, and compliance 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, contractors and visitors. The individual must be a results-oriented person who can achieve tangible improvements in the corporate security arena.

Duties and Responsibilities:

- Responsible for all data/information security policies, standards, evaluations, roles, and corporate awareness.
- Work with user and technical groups and Internal Auditors in the development and implementation of a security strategy designed to provide a high level of security over physical facilities and data processing while preserving and enhancing facility and system usability.
- Develop and implement flexible security solutions, dictated by the needs of a hybrid and rapidly evolving decentralized business environment.
- Work closely with corporate executives, business managers, audit and legal counsel to understand corporate requirements related to security and regulatory compliance, and to map those requirements to current security projects.
- Develop, implement, and manage the overall enterprise process for security strategy and associated architecture and engineering standards.
- Develop and implement policies, standards and guidelines related to corporate security.
- Oversee the continuous monitoring and protection of facilities, personnel and information systems.
- Evaluate suspected security breaches and recommend corrective actions (including incidents involving outside vendors).
- Serve as the enterprise focal point for security incident response planning and execution.
- Define and implement an ongoing Risk Assessment program, which will define, identify, and classify critical assets, assess threats and vulnerabilities regarding those assets, and implement safeguard recommendations.
- Assist Internal Audits in the development of appropriate criteria needed to assess the level of new/existing applications and/or technology infrastructure elements for compliance with enterprise security standards.

- Conduct periodic internal reviews or audits to ensure that compliance procedures are followed.
- Identify compliance issues that require follow-up or investigations and complete a monthly progress report of these issues.
- Conduct or direct the internal investigation of compliance issues.
• Establish and monitor formal certification programs regarding enterprise security standards relating to the planned acquisition and/or procurement of new applications or technologies.
• Assist in the review of applications and/or technology environments during the development or acquisitions process to (a) assure compliance with corporate security policies and directions and (b) assist in the overall integration process regarding the company’s own technology environment.
• Oversee the development of, and be the enterprise champion of, a corporate security awareness and training program.
• Manage security functions related to corporate information systems or data centers, working closely with the VP of information security.
• Evaluate changes to the corporate environment for security impact and present findings to management.

**Reporting**
- Report directly to executive management and will serve on the Executive Planning Council.
- Maintain reports including an administrative assistant, the manager of security architecture and engineering, and various other staff.
- Generate reports for internal and external auditing purposes.

**Chief Marketing Officer – Kathryn Battista**

**Superior:** Chief Executive Officer

**Job Description:** Responsible for planning, development and implementation of all of the company’s marketing strategies, marketing communications, and public relations activities, both external and internal. The position reports to the Medical Director and participates with the other management staff in charting the direction of the company, assuring its accountability to all constituencies, and ensuring its effective operation. This position has primary working relationships with the senior management team, staff of the marketing and communication function, and the service providers, as well as with the media, marketing representatives, and community organizations.

**Duties and Responsibilities:**

**Marketing and Social Media**
- Maintains and develops social media sites, website content and design, advertisements, newsletters, and any other marketing materials for the company.
- Coordinate media interest in the company and ensure regular contact with target media and appropriate response to media requests.
- Oversees development and implementation of support materials and services for programs and chapters in the area of marketing, communications, and public relations.

**Communications**
- Act as the Organization’s representative with the media and press.
- Coordinate media interest in the Organization and ensure regular contact with target media and appropriate response to media requests.
• Direct the development or implementation of compliance-related policies and procedures throughout an organization.

**Community Outreach**

• Effectively enable volunteers and staff so they can take action on behalf of the company by transmitting the company’s values, vision and direction;
• Engage people in the mission of the company; respecting and using the skills, expertise, experience and insights of people;
• Provide direction and resources, removing barriers and helping develop people’s skills
• Articulate expectations and clarifying roles and relationships.
• Anticipate conflicts and facilitate resolutions, ensuring quality decision-making.

**Other**

• Respond to inquiries concerning the company specials, employment, press and media.
• Serve as a community outreach representative to plan and coordinate the company involvement in community and industry events and programs.
• Monitor market trends to ensure the company’s relevance in methods of communication and marketing, and respond to industry and market changes.
• Keep informed of developments in the fields of marketing, communications and public relations, not-for-profit management and governance, as well as industry regulations.
• Develop and coordinate means to seek regular input from the Organization’s key constituencies regarding the quality of programs and services and the company’s relevance.
• Develop, implement, and monitor systems and procedures necessary to the smooth operation of the marketing/communications/public relations function.
• Design and distribute monthly newsletter to patients, community organizations, and industry contacts.
• Develop, coordinate, and oversee programs, technical assistance and resource materials to assist community chapters and programs in the marketing, communications and positioning of their activities.

**Head Pharmacist/General Manager**

• Candidate must have the ability to work in a fast-paced, changing, and challenging environment.
• Candidate must be analytically and communicatively intelligent.
• Candidate must have the ability to take unqualified responsibility for the company while maintaining a problem-solving, vision-based attitude.
• Candidate must have market and political knowledge.
• Candidate must have the ability to focuses simultaneously on short- and long-term goals and to identify problems quickly.
• Experienced in a leadership role.
• Four years of experience in a position with managerial and inventory responsibilities.
• Experience with an inventory system.
Human Resources Manager
- Four years of experience in a position with human resource and managerial responsibilities.

Medical Director
- Candidates must have the ability to identify training and informational deficiencies and respond by implementing specific measures to counter these inadequacies.
- Candidate must have experienced in a leadership role, training and community outreach.
- Candidate must have at least four years of experience in a position with medical experience and responsibilities.

Inventory Manager
- Candidate must have strong communication and leadership qualities.
- Candidate must exhibit a sense of urgency when necessary.
- Candidate must have the ability to direct, coach, support, and delegate tasks to management and employees.
- Candidate must have the ability to issue and explain instructions effectively.
- Candidate must have demonstrated experience in a position requiring critical-thinking, problem-solving, planning and assessment.
- Candidate must have computer literacy in word processing, point-of-sale systems, and data base management.
- Candidate must have commitment to working with shared leadership and in cross-functional teams.
- Candidate must have the ability to manage multiple projects at a time.
- Candidate must have at least four years of experience in a position with managerial and inventory responsibilities.
- Candidate must have experience with an inventory system.

Dispensary Manager
- Candidate must have the ability to lead a team.
- Candidate must have at least four years of experience in a position with managerial and inventory responsibilities, preferably in the medical marijuana industry.
- Candidate must have experience with an inventory system and related recordkeeping requirements.

Physician, Pharmacist, Physician Assistant and/or Certified Registered Nurse Practitioner
- Can verify the candidate is a licensed medical professional.
• Can provide evidence of completing the 4-hour training course developed by the Department covering the latest scientific research on medical marijuana, including the risks and benefits of medical marijuana, and other information deemed necessary by the Department. §1161.25(c).
• Candidates must agree, in the form of a written affidavit, not to issue a patient certification to any patient while at the facility. §1161.25(e).
• Candidates must have the ability to operate a multi-phone line system.
• Candidates must have strong attention to detail, organizational skills and time management abilities.
• Candidates must have great customer service skills.
• Candidates must be able to accurately enter data and perform recordkeeping tasks.
• Experience with point-of-sale systems.
• Candidates must have knowledge of medical marijuana policy and law.
• Candidates must have the ability to work in a fast-paced, changing, and challenging environment.
• Candidates must have the ability to make decisions as necessary with oversight when needed.
• Candidates must have proficiency in windows-based software and internet navigation.
• Candidates must have an aptitude for written and verbal communication. Report writing and data collecting are mandatory.
• Candidate must have at least four years of experience in a position with medical or pharmaceutical experience and responsibilities.
• Candidate must have experience with an inventory system and related recordkeeping requirements.

Facility Manager
• Candidate must have two years of experience in a position with facilities management responsibilities.

Employees

Assistant Dispensary Manager
• Candidate must have at least two years of experience in a position with managerial and inventory responsibilities.
• Candidate must have experience with an inventory system.

Assistant Dispensary Manager
**Supervisor:** Dispensary Manager

**Job Description:** The Assistant Manager is responsible for managing day-to-day operations of the company dispensary in accordance with Commonwealth and local laws, and standards set by the company. The Assistant Manager provides support to all Patient Coordinators and Patient Consultants,
which includes: scheduling, training, providing policy and procedure updates, product information, and keeping updated with industry news. The Assistant Manager is responsible for maintaining the dispensary sales floor, ordering and receiving all inventory and products, arranging deliveries, and maintaining facility compliance and cleanliness. The Assistant Manager must maintain a professional appearance, organized work environment and facility appearance.

Duties and Responsibilities:

**Agent Support and Management**
- Responsible for managing dispensary staff, schedules, inventory and patient relations;
- Serves as a role model and resource for dispensary staff concerning products and services, policies and procedures, industry news and changes in regulations;
- Responds to all agent questions, concerns or suggestions and takes action when necessary to resolve conflicts;
- Responsible for delegating tasks to agents in order to maintain a compliant and clean facility; and
- Coordinates with the Dispensary Manager to ensure accurate information is communicated to dispensary staff.

**Customer Service**
- Provides superior customer service for vendors, patients and caregivers;
- Responds to all patient complaints, requests, concerns, suggestions and takes action when necessary to resolve conflicts; and
- Oversee orders and deliveries to ensure accurate order information and timeliness of deliveries.

**Reports and Documentation**
- Maintain accurate records of all dispensary activities including patient records, sales, deliveries and returns in accordance with the Commonwealth of Pennsylvania and the standards set by the company;
- Maintain inventory control system and perform daily counts of all marijuana and marijuana products in the facility; and
- Provide regular inventory and sales reports to the Dispensary Manager.

**Inventory System Administer**
- Candidates must have at least two years of experience in a position with managerial and inventory responsibilities.
- Candidates must have experience with an inventory system.

**Patient Coordinator**
- Candidate must have experience in a fast-paced office environment preferred.
- Candidate must be able to do accurate data-entry and recordkeeping.
• Candidate must have experience with an inventory and patient management system.
• Candidate must have the ability to answer multi-phone line system.
• Candidate must have strong attention to detail, organizational skills and time management abilities.
• Candidate must have superior customer service skills.

Patient Counselor

• Candidate must have experience in a high end sales environment preferred.
• Candidate must have strong attention to detail, organizational skills and time recordkeeping abilities.
• Candidate must have superior customer service skills.
• Candidate must have experience with an inventory and patient management system.

Dispensary Technician

• Candidates must have great customer service skills.
• Candidates must be able to accurately enter data and perform recordkeeping tasks.
• Experience with point-of-sale systems.
• Candidates must have knowledge of medical marijuana policy and law.
• Candidates must have the ability to work in a fast-paced, changing, and challenging environment.
• Candidates must have the ability to make decisions as necessary with oversight when needed.
• Candidates must have proficiency in windows-based software and internet navigation.
• Candidates must have an aptitude for written and verbal communication. Report writing and data collecting are mandatory.
• Candidate must have four years of experience in a position with physician or nursing experience and responsibilities.
• Candidate must have experience with an inventory system.
Personnel Training Requirements

- As a matter of policy, the company will require all principals, financial backers, operators and employees to successfully complete a free, 2-hour, training course developed and offered by the Department covering: the provisions of the act and §1141.48 relevant to the responsibilities of dispensary personnel, proper handling of medical marijuana, proper recordkeeping, how to prevent and detect the diversion of medical marijuana, best practice security procedures, and best practice safety procedures including responding to a medical emergency, fire, chemical spill and a threatening event such as an armed robbery, burglary or criminal incident.

- The company will require each principal, financial backer and operator listed in the initial permit application to complete the training course prior to starting initial operation, and will require any additional principal, financial backer or operator to complete the training course prior to starting work.

- The company will also require each employee who has direct contact with patients or caregivers, or who physically handles medical marijuana, listed in the initial permit application to complete the training course within 90 days after starting work at the facility, and will also require all new employees to complete the training course prior to starting work.

- The company will require each physician, pharmacist, physician assistant or certified registered nurse practitioner, prior to assuming any duties at any of its dispensary locations, to successfully complete a 4-hour training course developed and offered by the Department providing instruction in the latest scientific research on medical marijuana, including the risks and benefits of medical marijuana, and other information deemed necessary by the Department.§1161.25(c).

- The company will retain the attendance records to the training course of all personnel and will make them available for inspection by the Department and its authorized agents upon request.

- The company will recertify all principals, financial backers, operators and employees on Department mandated training courses as required.
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<th>ID</th>
<th>Task Name</th>
<th>Duration</th>
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The standard operating procedures presented in this document provide a formal outline of the procedures Keystone Integrated Care will enact to ensure compliance with the company’s policies and the Pennsylvania Department of Health regulations.
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ADVERSE EVENT

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Background: It is the goal of the company to minimize the occurrence of adverse events. In the event of an adverse event, they must be documented and reported.

Purpose: To provide step-by-step instructions for the company’s protocols for documenting and reporting adverse events.

Scope: This document is designed to provide a formal outline of the procedures all personnel shall follow to ensure compliance with the company policy and regulatory agency regulations.

Related Standards and Procedures:

- Cleaning, Sanitation and Hygiene
- PRODUCT COMPLAINTS
- PRODUCT HANDLING AND STORAGE
- WASTE DISPOSAL

Definitions:

“Adverse Medical Experience” refers to any adverse event associated with the use of a medical marijuana product, whether or not considered medical marijuana related, including events occurring during routine product usage, such as product abuse, overdose, withdrawal or any failure of expected pharmacological action.

“Disability” refers to a substantial disruption of a person’s ability to conduct normal life function.

“Life-Threatening Adverse Medical Experience” refers to any adverse medical experience that places the patient, at immediate risk of death from the adverse medical experience as it occurs.

“Serious Adverse Medical Experience” refers to any adverse experience occurring at any dose that results in any of the following outcomes: death, a life-threatening adverse medical experience, inpatient
hospitalization or prolongation of existing hospitalization, a persistent or significant disability or incapacity, or a congenital anomaly (birth defect).

“Unexpected Adverse Medical Experience” refers to any adverse medical experience not listed in the current labeling or safety insert for the medical marijuana product. This includes events that may be symptomatically related to a listed event, but differs from the event because of greater severity or specificity.

Procedure:

Step 1) The company will report adverse events according to the procedures described herein.

Step 2) Receipt of Complaints:
   i. Customer complaints may be received in writing, via mail, email or telephone.
   ii. All complaints will be immediately forwarded to the Quality Control Manager.
   iii. All complaints will be evaluated to determine if they meet the preceding definition for an Adverse Medical Experience.
   iv. All adverse events will be documented in the Adverse Event Log.

Step 3) Investigation:
   i. The Quality Control Manager shall promptly investigate all events utilizing sound scientific principles based upon the nature of the medical experience and whenever appropriate include retesting of any suspect product according to its written specifications, and shall create an Adverse Event Report.
   ii. Submit follow-up reports to the appropriate regulatory agency within fifteen (15) calendar days of receipt, if significant new information becomes available or as requested by the department.
   iii. If additional information is not obtainable, records should be maintained of the unsuccessful steps taken to seek additional information.
   iv. Every effort should be made to obtain any remaining portion of the original complaint product.
   v. Complaints determined to be either a Serious or Unexpected adverse medical experiences, see previous definitions, must be reported to the appropriate regulatory agency within twenty-four (24) hours of their occurrence and receipt of the complaint by the Quality Control Manager.
   vi. The above reports submitted to the regulatory agency should maintain patient privacy thus not disclosing patient names or addresses.
   vii. The reports should include the name of the reporter from whom the information was received.

Step 4) Product:
   i. Any available original complaint product should be returned to the dispensary facility and subsequently forwarded to the manufacturing site for evaluation and testing.
Step 5) While Dispensary is active:
  i. Minimize door opening to reduce possible contamination.
  ii. Keep area tidy, swept, and uncluttered – ensure waste materials are immediately disposed of according to WASTE DISPOSAL.
  iii. When handling medical marijuana, use new gloves.
  iv. Tools and other equipment and surfaces should be lightly cleaned with 91% isopropyl alcohol daily or as necessary according to the Cleaning, Sanitation and Hygiene.
  v. Maintain climate control system to mitigate airborne contamination.
  vi. Use sanitary handling procedures in accordance with the requirements listed in procedure for PRODUCT HANDLING AND STORAGE.
  vii. Store packaging materials and medical marijuana appropriately to prevent contamination and adulteration.
  viii. Prevent cross-contamination and mix-ups between contaminated and unadulterated medical marijuana.
  ix. All cannabis and cannabis product waste from dispensary operations must be disposed of in accordance with the procedures for WASTE DISPOSAL.

Health and Safety Considerations:

- All employees will receive proper training prior to employment to ensure efficient and compliant procedures are upheld to the company’s standards.
- All employees are required to properly display a valid employee occupational license or registration card at all times while on the licensed premises of the facility.
- All work areas, contact surfaces, utensils and tools must be cleaned and sanitized prior to and after use according to the requirements listed in the procedure for Cleaning, Sanitation and Hygiene.

Records and Forms:

- Adverse Event Log
- Adverse Event Report

Competency and Responsibility:

- Employee experience and training required:
  - Trained on the Dispensary – Adverse Event SOP and related equipment.
  - Clearance to work in the Dispensary.
- Employee with supervisory responsibility for this Standard Operating Procedure:
  - Quality Control Manager.
Health and Safety Considerations:

- All dispensary employees will receive proper training prior to employment to ensure efficient and compliant procedures are upheld to the company’s standards.
- All employees are required to properly display a valid employee occupational license or registration card at all times while on the licensed premises of the dispensary facility.
- All work areas, contact surfaces, utensils and tools must be cleaned and sanitized prior to and after use according to the requirements listed in the procedure for Cleaning, Sanitation and Hygiene.
- All employees will receive a security briefing to ensure employees are aware of the seriousness of diversion.
- All employees must report any suspicion of theft or diversion to the Dispensary Manager, the Security Officer, or Compliance Officer immediately as a condition of employment.

Records and Forms:

- Final Written Report
- Preliminary Written Report

Competency and Responsibility:

- Employee experience and training required:
  - Trained on the Dispensary – Anti Diversion SOP and related equipment.
  - Clearance to work in the Dispensary.
- Employee with supervisory responsibility for this Standard Operating Procedure:
  - Dispensary Manager.
CHECK-IN PROCEDURES

Disclaimer: Information presented in the SOP is intended to be used by those skilled in the art, and is subject to change. It will require updates, as methodologies evolve, equipment specifications are determined, internal quality control protocols develop, local and state regulations are identified, and facility layouts are defined.

Background: To control the flow of traffic within the dispensary, the company must have a check-in procedure for each individual attempting to gain access to the dispensary.

Purpose: To provide step-by-step instructions for the check-in of patients at the Dispensary.

Scope: This document is designed to provide a formal outline of the procedures the Dispensary Manager shall follow to ensure compliance with the company policy and regulatory agency regulations.

Related Standards and Procedures:

- UPDATING PATIENT INFORMATION
- VISITOR POLICY
- WASTE DISPOSAL

Definitions:

“Check-in Area” refers to the area within the Dispensary where patient and visitor information is recorded.

Procedure:

Step 1) The Check-in Area will be used to check-in each individual attempting to access the dispensary according to the procedures described herein.

Step 2) New Customer

i. Warmly greet the customer by name. Introduce yourself and ask the customer how they are and say “Thank you for being a new customer and for coming in today”.

ii. Retrieve a state issued photo ID or driver’s license, medical marijuana registration and other required identification, per regulatory agency regulations;
iii. Compare the photo on the ID to the customer’s likeness and verify all regulatory requirements, including but not limited to:
   a. Customer is 18+ years of age or is accompanied by a parent or guardian.
   b. ID is not expired.
   c. His or her information matches the ID.
   d. ID does not appear to be fraudulent. If you suspect it may be fraudulent, contact the Dispensary Manager.

iv. Scan the ID directly into the electronic tracking system, if possible, and input all required information so the customer can be checked into the sales queue.

v. If the customer is a state registered patient, ask them to complete the In State Patient Intake Form and verify it was filled out correctly.

vi. Provide the customer with a Cannabis Education Guide. Explain it is his or hers to keep and to let the appropriate dispensary employee know if he or she has any questions.

vii. The dispensary employee will greet the customer in the waiting room and take him or her to the sales area when ready. If applicable, provide the dispensary employee with the patient’s In State Patient Intake Form to verify the quantity authorized by the regulatory agency regulations.

Step 3) Returning Customer
i. Warmly greet the customer by name. Introduce yourself and ask the customer how they are and say “It’s good to see you again”.

ii. Follow the “New Customer” procedures for check-in.

iii. Returning customers must present required identification each time they visit the dispensary.

Step 4) Out of State Patient (if applicable) - In full compliance with state law, the company serves cannabis patients who reside full-time in a state other than “Specify State” where the legal use of cannabis and cannabis products are recognized. The following steps must be followed in order to check in an out of state patient:

i. Ask for the patient’s state issued photo ID or driver’s license and out of state Medical Marijuana Registration card for the medical use of cannabis;

ii. Compare the photo on the state-issued ID to the patient’s likeness and verify that the ID is not expired;

iii. Verify the out of state Medical Marijuana Registration has not expired and the name on the document matches the ID presented;

iv. Perform due diligence to verify the documents presented are authentic from their state of origin;

v. Have the patient complete both sides of the “Out of State Patient Intake Form”;

vi. Provide a copy of the “Out of State Patient Intake Form” to the patient so it will be present, along with the sales receipt for cannabis purchases in the event the patient is stopped by law enforcement within the State of “Insert State”;
vii. Provide the patient with a “New Patient Education Guide.” Explain it is his/hers to keep and to let a Dispensary Employee know if he/she has any questions;

viii. For out of state patients, select the “Out-of-State” tab on the state’s patient sales verification system. Enter the patient’s driver’s license number into the state’s patient sales verification system and write the quantity of product that the patient is authorized to purchase on the “Out of State Patient Sales Information Card.” Inform the patient of their authorized purchase quantity.

ix. The dispensary employee will greet him/her in the waiting room and take him or her to the sales area when ready. Provide the dispensary employee with the “Out of State Patient Sales Information Card” listing the quantity of product the patient is authorized to purchase.

Step 5) Visitors and Authorized Persons
   i. Refer to the VISITOR POLICY SOP for instructions.

Step 6) While Check-in Area is active:
   i. Minimize door opening to reduce possible contamination.
   ii. Keep area tidy, swept, and uncluttered – ensure waste materials are immediately disposed of according to WASTE DISPOSAL SOP.
   iii. When handling medical marijuana, use new gloves.
   iv. Tools and other equipment and surfaces should be lightly cleaned with 91% isopropyl alcohol daily.

Health and Safety Considerations:

- All employees are required to properly display a valid employee occupational license or registration card at all times while on the licensed premises of the dispensary facility.
- All employees must maintain a sharp awareness of customers entering the dispensary facility and as they are leaving.

Records and Forms:

- Cannabis Education Guide
- Company Rules and Regulations Agreement
- Visitor Log
- Patient Intake Form: In State
- Patient Intake Form: Out of State (if applicable)
- Patient Sales Information Card

Competency and Responsibility:

- Employee experience and training required:
  o Trained on the Dispensary – Check-in Procedures SOP and related equipment.
- Clearance to work in the Dispensary.
- Employee with supervisory responsibility for this Standard Operating Procedure:
  - Dispensary Manager.
## COMMUNITY INTEGRATION

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**Background:** Integrating the community into the company’s healthcare program is a must. The company will spend a significant amount of its time encouraging the community to attend educational seminars and workshops to introduce them to the company’s products and medical marijuana in general.

**Purpose:** To provide step-by-step instructions for the company’s protocols for integrating the community into the company’s healthcare program.

**Scope:** This document is designed to provide a formal outline of the procedures all dispensary personnel shall follow to ensure compliance with the company policy and regulatory agency regulations.

**Related Standards and Procedures:**

- Cleaning, Sanitation and Hygiene
- PRODUCT HANDLING AND STORAGE
- WASTE DISPOSAL

**Definitions:**

N/A

**Procedure:**

Step 1) The company will enact community integration practices according to the procedures described herein.

Step 2) All community integration efforts must be handled in accordance with the community relations plan covering:

i. Customer Education,

ii. Philanthropic Giving Program,
iii. Local Outreach and Improvement,
iv. Customer Financial Assistance Program,
v. Customer-to-Customer Assistance Program, and
vi. Program Management.

Step 3) Public Relations Manager:
   i. Request approval of all community integration efforts by submitting a community relations plan to the Compliance Officer.
   ii. The request will include a complete description of each of the plan areas as described in the policies section.
   iii. Written approval from the Compliance Officer must be obtained prior to implementing any aspect of the community integration plan.

Step 4) Compliance Officer:
   i. All community relations plan requests are reviewed in accordance with the most current regulatory agency regulations to ensure all regulatory requirements have been met.
   ii. Any questions and/or concerns regarding the request must be directed to the company’s legal department for guidance and/or approval.
   iii. Maintain a copy of the community integration plan for review by the regulatory agency, as needed.
   iv. Community integration efforts will be reviewed to ensure they meet all regulatory agency regulations.

Step 5) While Dispensary is active:
   i. Minimize door opening to reduce possible contamination.
   ii. Keep area tidy, swept, and uncluttered — ensure waste materials are immediately disposed of according to WASTE DISPOSAL.
   iii. When handling medical marijuana, use new gloves.
   iv. Tools and other equipment and surfaces should be lightly cleaned with 91% isopropyl alcohol daily or as necessary according to the Cleaning, Sanitation and Hygiene.
   v. Maintain climate control system to mitigate airborne contamination.
   vi. Use sanitary handling procedures in accordance with the requirements listed in procedure for PRODUCT HANDLING AND STORAGE.
   vii. Store packaging materials and medical marijuana appropriately to prevent contamination and adulteration.
   viii. Prevent cross-contamination and mix-ups between contaminated and unadulterated medical marijuana.
   ix. All cannabis and cannabis product waste from dispensary operations must be disposed of in accordance with the procedures for WASTE DISPOSAL.

Health and Safety Considerations:
• All dispensary employees will receive proper training prior to employment to ensure efficient and compliant procedures are upheld to the company’s standards.
• All employees are required to properly display a valid employee occupational license or registration card at all times while on the licensed premises of the dispensary facility.
• All work areas, contact surfaces, utensils and tools must be cleaned and sanitized prior to and after use according to the requirements listed in the procedure for **Cleaning, Sanitation and Hygiene**.
• All employees will receive a security briefing to ensure employees are aware of the seriousness of diversion.
• All employees must report any suspicion of theft or diversion to the Dispensary Manager, the Security Officer, or Compliance Officer immediately as a condition of employment.

**Records and Forms:**

• Community Integration Plan

**Competency and Responsibility:**

• Employee experience and training required:
  - Trained on the Dispensary – Community Integration SOP and related equipment.
  - Clearance to work in the Dispensary.
• Employee with supervisory responsibility for this Standard Operating Procedure:
  - Dispensary Manager.
CRIMINAL ACTIVITY POLICY

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Background: The company intends to form a Safety and Incident Review Team to lead the incident response and management program. The team will report to management, at least on a quarterly basis, all incidents and the corrective measures taken.

Purpose: To provide step-by-step instructions for establishing the company's criminal activity policy.

Scope: This document is designed to provide a formal outline of the procedures all dispensary personnel shall follow to ensure compliance with the company policy and regulatory agency regulations.

Related Standards and Procedures:

- Cleaning, Sanitation and Hygiene
- DISCIPLINE POLICY
- PRODUCT HANDLING AND STORAGE
- WASTE DISPOSAL

Definitions:

“Conviction” means, but is not limited to, a guilty verdict, guilty plea, prayer for judgment continued, Alford plea, or “no contest” plea.

“Entry of a Conviction” occurs, for purposes of this policy, when the court accepts the plea or enters the conviction. A prayer for judgment continued is a conviction as of the date the court grants the defendant the prayer for judgment continued.

Procedure:

Step 1) The company will enact a criminal activity policy for its dispensary personnel according to the procedures described herein.
Step 2) Security Officer Responsibilities:
   i. Investigate and identify the underlying causes of incidents,
   ii. Log the incident on a secure database,
   iii. Document the incident on a secure database,
   iv. Develop remedial actions to prevent recurrence, and
   v. Monitor follow-up by management to ensure remedial actions are properly implemented.

Step 3) Dispensary Manager Responsibilities:
   i. Administering this policy according to the guidelines found herein.
   ii. Failure to appropriately administer this policy will result in corrective action for the manager up to and including dismissal.

Step 4) Pre-Employment:
   i. Conduct background checks that include criminal activity prior to hire on applicants who have been selected for hire.
   ii. If an applicant’s criminal activity report is positive for conviction(s), the regency and type of conviction(s) will be reviewed based on the job description to determine the applicant’s suitability for employment.

Step 5) Current-Employment:
   i. Any current employee who is convicted of a criminal offense other than a minor traffic infraction must notify his/her supervisor within five (5) business days of the entry of the criminal conviction;
   ii. Any current employee who routinely operates a company vehicle or personal vehicle for business purposes and is convicted of a traffic infraction must also notify his/her supervisor within five (5) business days of the entry of the criminal conviction;
   iii. Any employee operating a motor vehicle who is involved in a motor vehicle incident (ticket or accident) while in the performance of work for the company must immediately notify his/her supervisor. The employee is subject to substance abuse testing; and
   iv. Failure to report a conviction as required above is grounds for discipline up to, and including termination of employment.

Step 6) Investigation and Notifications:
   i. The Dispensary Manager must immediately notify the Human Resources Manager of the conviction or accident upon discovery;
   ii. The Human Resources Department will confirm the conviction(s); and
   iii. After verification of the conviction(s), the Human Resources Manager will coordinate with the manager any appropriate corrective action to be administered for unacceptable personal conduct in accordance with the DISCIPLINE POLICY.
Step 7) While Dispensary is active:
   i. Minimize door opening to reduce possible contamination.
   ii. Keep area tidy, swept, and uncluttered – ensure waste materials are immediately disposed of according to WASTE DISPOSAL.
   iii. When handling medical marijuana, use new gloves.
   iv. Tools and other equipment and surfaces should be lightly cleaned with 91% isopropyl alcohol daily or as necessary according to the Cleaning, Sanitation and Hygiene.
   v. Maintain climate control system to mitigate airborne contamination.
   vi. Use sanitary handling procedures in accordance with the requirements listed in procedure for PRODUCT HANDLING AND STORAGE.
   vii. Store packaging materials and medical marijuana appropriately to prevent contamination and adulteration.
   viii. Prevent cross-contamination and mix-ups between contaminated and unadulterated medical marijuana.
   ix. All cannabis and cannabis product waste from dispensary operations must be disposed of in accordance with the procedures for WASTE DISPOSAL.

Health and Safety Considerations:

- All dispensary employees will receive proper training prior to employment to ensure efficient and compliant procedures are upheld to the company’s standards.
- All employees are required to properly display a valid employee occupational license or registration card at all times while on the licensed premises of the dispensary facility.
- All work areas, contact surfaces, utensils and tools must be cleaned and sanitized prior to and after use according to the requirements listed in the procedure for Cleaning, Sanitation and Hygiene.

Records and Forms:

N/A

Competency and Responsibility:

- Employee experience and training required:
  o Trained on the Dispensary – Criminal Activities Policy SOP and related equipment.
  o Clearance to work in the Dispensary.
- Employee with supervisory responsibility for this Standard Operating Procedure:
  o Dispensary Manager.
CUSTOMER EDUCATION AND MANAGEMENT

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Background: To ensure all patients and caregivers are properly informed about the medical marijuana products they are about to purchase the company will establish customer education and management procedures.

Purpose: To provide step-by-step instructions for customer education and management at the Dispensary.

Scope: This document is designed to provide a formal outline of the procedures the Dispensary Manager shall follow to ensure compliance with the company policy and regulatory agency regulations.

Related Standards and Procedures:

- CHECK-IN PROCEDURES
- UPDATING PATIENT INFORMATION
- VISITOR POLICY

Definitions:

N/A

Procedure:

Step 1) The Dispensary will act as the location for customer education and management according to the procedures described herein.

Step 2) Greeting:
   i. Select the next customer from the electronic tracking system queue to open a new order.
ii. Warmly greet the customer by name and direct towards the sales station. Introduce yourself, ask the customer how they are, say “It’s good to see you again” to repeating customers.

iii. Retrieve a state issued photo ID or driver’s license, medical marijuana registration and other required identification, per regulatory agency regulations.

iv. To initiate sales conversation, ask general and/or symptom-based questions, for instance:
   a. “How may I help you today?”
   b. “Is there a certain product or effect you are looking for?”

Step 3) Communication:

i. Do not ask questions or mention the customer’s medical conditions unless the customer reveals their situation and asks for guidance.

ii. Provide product recommendations based on the customer’s questions, requests, product popularity, special discounts, etc. Answer questions and provide product recommendations based on training and/or the Question Guide.

iii. Do not use slang words such as: weed, pot, stoner, stoned, baked, etc. Instead, keep a professional nomenclature and use words like: cannabis, consumer, medicated, intoxicated, potent, etc.

iv. Emphasize that cannabis affects people differently and new consumers should “start low and go slow”, especially with edibles and concentrates.

Step 4) Assisting Hearing Impaired Customers:

i. The Dispensary Manager must create a Standard Informational Sheet to be provided to hearing impaired customers.

ii. The Dispensary Manager will ensure each Customer Coordinator can easily access and provide a hard copy of the standard informational sheet and the current menu upon check in; and

iii. The Customer Coordinator assisting hearing-impaired customers may also have to communicate by writing and reading.

iv. The Standard Informational Sheet will include the following text, at a minimum:
   a. Welcome to our company!
   b. To make a purchase, we require a valid photo ID and your valid medical cannabis registry card, if a medical patient or caregiver. These documents will be returned to you as soon as we verify your information is correct in our system.
   c. As an in-state customer you are allowed to purchase XXX ounces in any one XXX-day period.
   d. As an in-state medical cannabis cardholder, patient or caregiver, you are allowed to purchase XXX ounces in any one XXX-day period.
   e. Our current menu is on display and available in the waiting room and sales stations.
In order to leave the building with cannabis, you will need to have a compliant exit package. We can sell you one for $X.00, and it is reusable.

If additional assistance is needed beyond your ability, notify the Dispensary Manager.

Please let us know if you have any questions, and we will do our best to answer them.

Step 5) Assisting Visually Impaired Customers:
   i. The Customer Coordinator must hold doors and provide polite verbal directions, as needed, to help visually impaired customers navigate the store.
   ii. If additional assistance is needed beyond your ability, notify the Dispensary Manager.

Step 6) Product Education:
   i. Provide feedback based on general feedback (without specifics), producer training, lab reports, and current science.
   ii. Never make medical claims, “This product cures migraines”. Instead, say “Generally, this product will have a sedative effect and can assist with sleep”.
   iii. Discuss ingredients, suggested dosing, ingestion methods, etc. based on product training and information printed on the product’s packaging.

Step 7) Building Orders:
   i. Inspect each product and verify the contents before entering the SKU into the ADP/POS system and placing into the designated container.
   ii. Verify the product(s) added to the order are correct.
   iii. Read the order to the customer to verify accuracy.
   iv. Verify the quantity ordered is no greater than the quantity authorized by regulatory agency regulations or the Patient Medical ID Card for state registered patients.
   v. Place the Patient Medical ID Card, if applicable, and products in the designated container.
      a. If the quantity ordered is more than the quantity allowed, politely explain to the customer and make recommendations for reducing the order to meet the quantity allowed.
      b. All employees must refuse to sell cannabis or cannabis products to a customer whom they suspect may be diverting product and must notify the General Manager immediately.

Step 8) Transfer to Cashier:
   i. Direct customer to the Cashier’s station, or to the line if there is a wait.
   ii. Walk the container to the Cashier’s station and place in line according to the customer’s position in the queue.

Step 9) While Dispensary is active:
i. Minimize door opening to reduce possible contamination.
ii. Keep area tidy, swept, and uncluttered – ensure waste materials are immediately disposed of according to WASTE DISPOSAL SOP.
iii. When handling medical marijuana, use new gloves.
iv. Tools and other equipment and surfaces should be lightly cleaned with 91% isopropyl alcohol daily.

**Health and Safety Considerations:**

- All employees are required to properly display a valid employee occupational license or registration card at all times while on the licensed premises of the dispensary facility.
- All employees must maintain a sharp awareness of customers entering the dispensary facility and as they are leaving.
- **Equal Access Policy:**
  - All employees must treat all customers equally.
  - The company will implement any measures necessary, within reason, to ensure customers with disabilities have equal access to cannabis and dispensary services.
- **Service Animals and Important Policy Points:**
  - The company will follow the Americans with Disabilities Act (ADA) requirements to allow service animals on the premises.
  - **Only limited inquiries are allowed!** Employees may ask two (2) questions: (1) is the dog a service animal required because of a disability and (2) what work or task has the dog been trained to perform?
  - Employees must not ask about the person’s disability, require medical documentation, require a special identification card or training documentation for the dog, or ask the dog to demonstrate its ability to perform the work or task;
  - Allergies and fear of dogs are not valid reasons for denying access or refusing service to customers with service animals. When an employee is allergic to dog dander and a customer using a service animal must spend time in the same room, (example, in a school classroom or at a homeless shelter), both should be accommodated by assigning them, to different locations within the room or preferably different rooms in the facility;
  - A customer with a disability cannot be asked to remove his or her service animal from the licensed premises unless:
    - (1) The dog is out of control and the handler does not take effective action to control it; or
    - (2) The dog is not housebroken. When there is a legitimate reason to ask that a service animal be removed, employees must offer the customer with the disability an opportunity to obtain goods or services without the animal’s presence.
  - Establishments that sell or prepare food must allow service animals in public areas, even if state or local health codes prohibit animals on the premises;
Customers with disabilities who use service animals cannot be isolated from other patrons, treated less favorably than other patrons or charged fees that are not charged to other patrons without animals. In addition, if a business requires a deposit or fee to be paid by patrons with pets, it must waive the charge for service animals;

If a business such as a hotel normally charges guests for damage they caused, a customer with a disability may also be charged for damage caused by them or the service animal; and

Employees are not required to provide care for a service animal.

**Records and Forms:**

- Question Guide
- Patient Medical ID Card
- Standard Informational Sheet

**Competency and Responsibility:**

- Employee experience and training required:
  - Trained on the Dispensary – Customer Education and Management SOP and related equipment.
  - Clearance to work in the Dispensary.
- Employee with supervisory responsibility for this Standard Operating Procedure:
  - Dispensary Manager.
DISCIPLINE POLICY

Standard Operating Procedure No.: KIC_SOP_XXXX
Revision No.: 0
Original Date of Issue: 03-20-2017
Revision Date: XX-XX-XXXX

Disclaimer: Information presented in the SOP is intended to be used by those skilled in the art, and is subject to change. It will require updates, as methodologies evolve, equipment specifications are determined, internal quality control protocols develop, local and state regulations are identified, and facility layouts are defined.

Background: The company has adopted a progressive discipline policy to identify and address employee and employment related problems.

Most often, employee conduct that warrants discipline results from unacceptable behavior, poor performance or violation of company policies, practices or procedures. However, discipline may be issued for conduct that falls outside of those identified areas.

Equally important, the company need not resort to progressive discipline, but may take whatever action it deems necessary to address the issue at hand. This may mean that more or less severe discipline is imposed in a given situation. Likewise, some company policies like sexual harassment and attendance, contain specific discipline procedures.

Of course, no discipline policy can be expected to address each and every situation requiring corrective action that may arise in the workplace. Therefore, the company takes a comprehensive approach regarding discipline and will attempt to consider all relevant factors before making decisions regarding discipline.

This policy applies to any and all employee conduct that the company, in its sole discretion, determines must be addressed by discipline.

Progressive discipline may be issued on employees even when the conduct that leads to more serious discipline is not the same that resulted in less severe discipline. That is, violations of different rules shall be considered the same as repeated violations of the same rule for purposes of progressive action.

Probationary employees are held to the highest standards for behavior and job performance. Progressive discipline is the exception rather than the rule for probationary employees.

While the company will generally take disciplinary action in a progressive manner, it reserves the right, in its sole discretion, to decide whether and what disciplinary action will be taken in a given situation. IN ADDITION, NOTWITHSTANDING ANYTHING TO THE CONTRARY IN THIS POLICY, EVERY EMPLOYMENT
RELATIONSHIP IN WHICH THCH IS INVOLVED AND THAT IS “AT WILL”, THCH RETAINS THE DISCRETION TO FOLLOW OR NOT FOLLOW THE DISCIPLINE PROCEDURES DESCRIBED ABOVE AND TERMINATE “AT WILL” EMPLOYEES FOR NO REASON.

It is the policy of the company that whenever an employee is disciplined in accordance with the policy a “Disciplinary Record” will be created and placed into the “Employee’s Personnel File”.

**Purpose:** To provide step-by-step instructions for the company’s disciplinary policy.

**Scope:** This document is designed to provide a formal outline of the procedures the Dispensary Manager shall follow to ensure compliance with the company policy and regulatory agency regulations.

**Related Standards and Procedures:**
- CRIMINAL ACTIVITY POLICY
- EMPLOYEE REPORTING AND COMPLAINTS POLICY

**Definitions:**
N/A

**Procedure:**

Step 1) The Dispensary will act as the location for disciplinary action involving dispensary personnel according to the procedures described herein.

Step 2) Dispensary Manager:
   i. Will immediately contact the Human Resources Manager when there is a situation that may or will require disciplinary action, prior to addressing the situation with the employee.

Step 3) Human Resources Manager:
   i. In conjunction with the department manager, determine the appropriate level of disciplinary action to be taken based on the situation and circumstances.
   ii. Both managers must always be present when the disciplinary action is communicated to the employee.
   iii. Ensure signatures, employee comments, etc. are properly documented during the meeting and placed in the employee Personnel File.

Step 4) Verbal Caution:
   i. An employee will be given a verbal caution when he or she engages in problematic behavior.
   ii. As the first step in the progressive discipline policy, a verbal caution is meant to alert the employee that a problem may exist or that one has been identified, which must be addressed.
iii. Verbal cautions will be documented and maintained by your manager or manager.

Step 5) Verbal Warning:
   i. A verbal warning is more serious than a verbal caution.
   ii. An employee will be given a verbal warning when a problem is identified that justifies a verbal warning or the employee engages in unacceptable behavior during the period a verbal caution is in effect.
   iii. Verbal warnings are documented and placed in the employee’s personnel file.

Step 6) Written Warning:
   i. A written warning is more serious than a verbal warning.
   ii. A written warning will be given when an employee engages in conduct that justifies a written warning or the employee engages in unacceptable behavior during the period that a verbal warning is in effect.
   iii. Written warnings are maintained in an employee’s personnel file.

Step 7) Suspension:
   i. A suspension without pay is more serious than a written warning. An employee will be suspended when he or she engages in conduct that justifies a suspension or the employee engages in unacceptable behavior during the period that a written warning is in effect.
   ii. An employee’s suspension will be documented.

Step 8) Decision-Making Leave:
   i. Generally following a suspension, an employee will be reprimanded and then sent home for the day on decision-making leave. This is intended to help the employee decide whether they should continue employment with the company.
   ii. If the employee returns, they will be expected to work harder than before to follow company guidelines and continue their employment without interruption.
   iii. The other option with this leave is the employee may choose to resign because employment with the company is not a match.

Step 9) Termination:
   i. An employee will be terminated when he or she engages in conduct that justifies termination or does not correct the matter that resulted in less severe discipline.

Step 10) While Dispensary is active:
   i. Minimize door opening to reduce possible contamination.
   ii. Keep area tidy, swept, and uncluttered – ensure waste materials are immediately disposed of according to Sanitization – Disposal Protocols SOP.
   iii. When handling medical marijuana, use new gloves.
iv. Tools and other equipment and surfaces should be lightly cleaned with 91% isopropyl alcohol daily.

Health and Safety Considerations:

N/A

Records and Forms:

- Disciplinary Record
- Employee Personnel File
- Caution, Warning, Suspension and Termination Forms

Competency and Responsibility:

- Employee experience and training required:
  - Trained on the Dispensary – Discipline Policy SOP and related equipment.
  - Clearance to work in the Dispensary.
- Employee with supervisory responsibility for this Standard Operating Procedure:
  - Dispensary Manager.
Disclaimer: Information presented in the SOP is intended to be used by those skilled in the art, and is subject to change. It will require updates, as methodologies evolve, equipment specifications are determined, internal quality control protocols develop, local and state regulations are identified, and facility layouts are defined.

Background: The company intends to have a safe working environment for its employees. To accomplish this all employees must follow the employee reporting and complaints policy.

Purpose: To provide step-by-step instructions for the company’s protocols for responding to and handling employee complaints and concerns.

Scope: This document is designed to provide a formal outline of the procedures the Dispensary Manager shall follow to ensure compliance with the company policy and regulatory agency regulations.

Related Standards and Procedures:
- DISCIPLINE POLICY
- Sexual Harassment Policy
- WASTE DISPOSAL

Definitions:
N/A

Procedure:
Step 1) The Dispensary will act as the location for employee complaints involving dispensary personnel or operations according to the procedures described herein.

Step 2) Employee:
   i. Talk about the problem or suggestion to the Dispensary Manager, and the manager is given the first opportunity to act on the suggestion or to settle any complaint.
   ii. He or she may report the problem to the General Manager, if not fully satisfied with the manager’s decision.
iii. If the complaint or suggestion is still not settled to his or her satisfaction, the employee may take their complaint or suggestion to the Chief Operating Officer for a hearing.

iv. When requested, the Human Resources Department will assist the employee prepare his or her written complaint.

**Step 3) Human Resources Manager:**

i. Must ensure the company provides a clear and open channel to employees for their expressions and suggestions.

**Step 4) Dispensary Manager:**

i. When a complaint or suggestion is presented, respond with immediate and focused attention with the employee,

ii. Provide quick action in getting the right answer, and

iii. Follow up the initial complaint with prompt communication to the employee.

iv. **One word of caution:** the managers must not give employees advice on any election or choice of benefits. If such advice should prove unreliable or result in any loss to the employee, the company could be held liable. Questions or complaints concerning this policy must be referred to the Human Resources Department.

**Step 5) Higher Management:**

i. If the complaint is beyond the scope of the immediate manager’s jurisdiction, the employee should be directed to discuss the matter with a manager who has the authority to respond.

ii. When an employee’s complaint is taken beyond the immediate manager, it is suggested the complaint be reduced to writing in order to establish the facts of the matter and avoid variations in the facts. This will assure those to whom the matter is appealed are considering the same problem presented to the immediate manager.

iii. Although the company believes it important to preserve the immediate manager’s authority and dignity and to uphold the manager’s decision, it is vital that higher management do nothing to undermine the employee’s confidence in the company’s desire to act fairly and in good faith.

iv. If it is decided that the immediate manager’s decision should be reversed, the higher management should:
   
   a. Review the facts with the immediate manager,
   b. Explain the situation and the reason why a different decision is necessary, and
   c. Encourage the immediate manager to join in the reversal of the decision.

**Step 6) Sexual Harassment Policy:**

i. The company has a specific policy concerning sexual harassment and a specific procedure for complaints of sexual harassment that supersedes the procedures outlined here.
Step 7) While Dispensary is active:
   i. Minimize door opening to reduce possible contamination.
   ii. Keep area tidy, swept, and uncluttered – ensure waste materials are immediately disposed of according to WASTE DISPOSAL.
   iii. When handling medical marijuana, use new gloves.
   iv. Tools and other equipment and surfaces should be lightly cleaned with 91% isopropyl alcohol daily.

Health and Safety Considerations:

- All employees are encouraged to talk with a manager about any problem, complaint, or suggestion that concerns his or her work.

Records and Forms:

- Complaint Log
- Employee Personnel File

Competency and Responsibility:

- Employee experience and training required:
  o Trained on the Dispensary – Employee Reporting and Complaints Policy SOP and related equipment.
  o Clearance to work in the Dispensary.
- Employee with supervisory responsibility for this Standard Operating Procedure:
  o Dispensary Manager.
FACILITY REQUIREMENTS

Disclaimer: Information presented in the sop is intended to be used by those skilled in the art, and is subject to change. It will require updates, as methodologies evolve, equipment specifications are determined, internal quality control protocols develop, local and state regulations are identified, and facility layouts are defined.

Background: The company will establish the following facility requirements to comply with the company’s policies and the Department regulations.

Purpose: To provide step-by-step instructions for establishing the company’s facility requirements.

Scope: This document is designed to provide a formal outline of the procedures the Dispensary Manager shall follow to ensure compliance with the company policy and regulatory agency regulations.

Related Standards and Procedures:

- Cleaning, Sanitation and Hygiene
- PRODUCT HANDLING AND STORAGE
- WASTE DISPOSAL

Definitions:

N/A

Procedure:

Step 1) The company will enact facility requirements for each dispensary location according to the procedures described herein.

Step 2) The dispensary facility will be organized to limit any areas of customer access separate from medical marijuana product storage.

Step 3) Different operations including the receipt, storage and dispensing of medical marijuana products shall be performed within specifically defined areas of adequate size for that activity.
Step 4) Maintain receiving, storage and dispensing areas in a clean and orderly manner.

Step 5) Materials stored in boxes or cartons will be kept off the floor and suitably spaced to permit cleaning or inspection.

Step 6) Areas will be swept daily and mopped when needed.

Step 7) Equipment for adequate control of air temperature and humidity shall be provided where appropriate for the holding of medical marijuana product.

Step 8) While Dispensary is active:
   i. Minimize door opening to reduce possible contamination.
   ii. Keep area tidy, swept, and uncluttered – ensure waste materials are immediately disposed of according to WASTE DISPOSAL.
   iii. When handling medical marijuana, use new gloves.
   iv. Tools and other equipment and surfaces should be lightly cleaned with 91% isopropyl alcohol daily or as necessary according to the Cleaning, Sanitation and Hygiene.
   v. Maintain climate control system to mitigate airborne contamination.
   vi. Use sanitary handling procedures in accordance with the requirements listed in procedure for PRODUCT HANDLING AND STORAGE.
   vii. Store packaging materials and medical marijuana appropriately to prevent contamination and adulteration.
   viii. Prevent cross-contamination and mix-ups between contaminated and unadulterated medical marijuana.
   ix. All cannabis and cannabis product waste from dispensary operations must be disposed of in accordance with the procedures for WASTE DISPOSAL.

Health and Safety Considerations:

- All dispensary employees will receive proper training prior to employment to ensure efficient and compliant procedures are upheld to the company’s standards.
- All employees are required to properly display a valid employee occupational license or registration card at all times while on the licensed premises of the dispensary facility.
- All work areas, contact surfaces, utensils and tools must be cleaned and sanitized prior to and after use according to the requirements listed in the procedure for Cleaning, Sanitation and Hygiene.

Records and Forms:

- N/A

Competency and Responsibility:

- Employee experience and training required:
- Trained on the Dispensary – Facility Requirements SOP and related equipment.
- Clearance to work in the Dispensary.

- Employee with supervisory responsibility for this Standard Operating Procedure:
  - Dispensary Manager.
**HANDLING PRODUCTS AND CASH**

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**Background:** To ensure products are not mishandled and cash is not misplaced, the company will establish protocols for the handling of product and cash.

**Purpose:** To provide step-by-step instructions for the company’s protocols for ensuring no unlawful sales transactions are permitted or tolerated.

**Scope:** This document is designed to provide a formal outline of the procedures all dispensary personnel shall follow to ensure compliance with the company policy and regulatory agency regulations.

**Related Standards and Procedures:**

- Assisting Customers
- WASTE DISPOSAL

**Definitions:**

N/A

**Procedure:**

Step 1) The Dispensary will act as the location where medical marijuana is transferred to the patient according to the procedures described herein.

Step 2) Employee Login:

i. Before handling any product requested by a customer:
   a. Login the electronic tracking system.
   b. Enter your unique user ID and password.

Step 3) Assist the Customer:

i. See procedure for Assisting Customers.
Step 4) Handling Medical Marijuana Products:
   i. After a customer has selected a product for purchase:
      a. Scan the barcode on the product’s package to add the item to the customer’s order;
      b. If the purchase includes multiple items of the same medical marijuana product, each item must be scanned individually.
         1. Example: if a customer purchases two (2) vaporizer pens, you cannot scan the same vaporizer pen twice; each pen must be scanned separately;
      c. Place product in the order basket.
   ii. After a patient or caregiver has selected a product for purchase:
      a. Scan the barcode on the product’s package to add the item to the customer’s order;
      b. If the purchase includes multiple items of the same medical marijuana product, each item must be scanned individually.
         1. Example: if a customer purchases two (2) vaporizer pens, you cannot scan the same vaporizer pen twice; each pen must be scanned separately;
      c. Ensure the quantity of the product does not exceed the authorized limit indicated on the patient sales information card; and
      d. Place product in the order basket.

Step 5) Transfer to Cashier:
   i. Once the order is complete
      a. Place the order basket in the queue near the Cashier’s counter; and
      b. Explain to the customer the cashier will complete the transaction.
      c. Say, “Thank you for shopping with us and we look forward to seeing you again”.

Step 6) Handling Cash:
   i. Cashiers are responsible for notifying the Dispensary Manager when their cash drawer exceeds $1,000.00;
   ii. The Dispensary Manager will remove the entire cash drawer and take it into the vault;
   iii. Once inside the vault, the Dispensary Manager will:
      a. Count and remove all excess cash leaving $200 in change before returning the drawer to the appropriate sales station.
      b. The removed cash will be labeled and stored inside the vault until the cashier’s check out process;
      c. All cash not inside a cash drawer at the sales station is to be secured in the vault at all times; and
      d. The manager must enter required cash records in the Daily Manager Notes Form at the close of the business day.

Step 7) While Dispensary is active:
i. Minimize door opening to reduce possible contamination.
ii. Keep area tidy, swept, and uncluttered – ensure waste materials are immediately disposed of according to WASTE DISPOSAL.
iii. When handling medical marijuana, use new gloves.
iv. Tools and other equipment and surfaces should be lightly cleaned with 91% isopropyl alcohol daily.

Health and Safety Considerations:

- The Dispensary Manager must ensure proper training requirements are met before employees are allowed to handle any products or cash.
- All employees must report any diversion or unlawful sales witnessed or suspected to the Dispensary Manager or the General Manager as soon as possible, as a condition of employment.
- Caution must be taken when handling medical marijuana products to avoid damaging the packaging and adulteration of the product.

Records and Forms:

- Daily Manager Notes Form

Competency and Responsibility:

- Employee experience and training required:
  - Trained on the Dispensary – Handling Products and Cash SOP and related equipment.
  - Clearance to work in the Dispensary.
- Employee with supervisory responsibility for this Standard Operating Procedure:
  - Dispensary Manager.
INCIDENT RESPONSE AND MANAGEMENT POLICY

Standard Operating Procedure No.: KIC_SOP_XXXX

Revision No.: 0

Original Date of Issue: 03-20-2017

Revision Date: XX-XX-XXXX

Disclaimer: Information presented in the SOP is intended to be used by those skilled in the art, and is subject to change. It will require updates, as methodologies evolve, equipment specifications are determined, internal quality control protocols develop, local and state regulations are identified, and facility layouts are defined.

Background: Incident and adverse investigations are an integral part of the company’s “Compliance Plan”. By monitoring and reporting the types of incidents and adverse events reported, steps can be taken to develop methods for reducing and eliminating occupational accidents, illnesses, and exposures. The company intends to form a Safety and Incident Review Team to lead the incident response and management program. The team will report to higher management, at least on a quarterly basis, all incidents and the corrective measures taken.

Purpose: To provide step-by-step instructions for the company’s protocols for the incident response and management policy.

Scope: This document is designed to provide a formal outline of the procedures all dispensary personnel shall follow to ensure compliance with the company policy and regulatory agency regulations.

Related Standards and Procedures:

- ADVERSE EVENT
- Cleaning, Sanitation and Hygiene
- PRODUCT HANDLING AND STORAGE
- WASTE DISPOSAL

Definitions:

“Adverse Events” refers to certain occurrences as defined in the company’s ADVERSE EVENT policies and procedures.

“Incidents” refers to certain occurrences that result in personal injury/illness to employees, patients, visitors, property damage, near miss incidents, and unplanned releases (i.e. large quantities of hazardous chemicals, water, sewer or gases).

Procedure:
Step 1) The company will enact an incident response and management plan according to the procedures described herein.

Step 2) The Security Officer must ensure the following steps are conducted:

   i. Investigate, identity, analyze and interpret the underlying causes of incidents,
   ii. If applicable, report all incidents resulting in personal injury/illness to employees, visitors, property damage, near miss incidents, and unplanned releases (i.e. large quantities of hazardous chemicals, water, sewer or gases).
   iii. If applicable, report all incidents including, near-misses, concerns, serious incidents, and unexpected customer events and product-related outcomes
   iv. Log the incident on a secure database,
   v. Document the incident on a secure database,
   vi. Develop remedial actions to prevent recurrence, and
   vii. Monitor follow-up by management to ensure remedial actions are properly implemented.

Step 3) Upon discovery or notification of an incident, the Security Officer must classify the Incident by severity and type (as outlined below) to help guide the nature of our response and subsequent reporting. Classification of Incident by type, including but not be limited to:

   i. Arrests,
   ii. Attempted robbery,
   iii. Bomb threats,
   iv. Employee misconduct,
   v. Explosion,
   vi. Fire,
   vii. Fire or security alarms,
   viii. Hazardous matter leak,
   ix. Homicide,
   x. Incidents involving law enforcement,
   xi. Injuries,
   xii. Intentional sabotage,
   xiii. Loss,
  xiv. Missing or lost data,
   xv. Missing property,
   xvi. Physical violence,
   xvii. Robbery,
   xviii. Substance abuse,
   xix. Suspicious persons,
   xx. Threatening behavior,
   xxi. Theft,
   xxii. Threats,
   xxiii. Trespassing,
Unauthorized use of equipment or property owned by the company,
Unethical behavior, unlawful activity,
Vandalism,
Weapons, or
Any other events that may adversely affect the company or its participation in the State’s medical marijuana program.

Step 4) Following classification, the Security Officer will launch an investigation to determine how and why staff, equipment, supplies, systems, or other factors failed to behave or function as anticipated. The incident investigation must include, but is not limited to:

i. Protecting other people and property,
ii. Preserving the scene as it was after the incident,
iii. Conducting a visual walk-through of the incident site,
iv. Identifying and conducting interviews with all witnesses,
v. Examining, collecting, and photographing all evidence (contact Security and Local Police for assistance if the incident may be criminal in nature), and
vi. Diagramming the accident site and preparing an Incident Report.

Step 5) Document each incident within a database through an Incident Report, using standardized, searchable forms that permit cross-report analysis.

Step 6) In the event of a serious incident, an Incident Report shall be submitted to the Dispensary Manager within fourteen (14) calendar days of the incident, including a detailed description of the incident and including answers to the following:

i. What happened?
ii. Who (individuals and/or companies) was involved?
iii. When did the incident occur?
iv. What injuries/property damage resulted?
v. Who witnessed the incident?
vi. Was the regulatory agency notified and how long after the incident occurred was the agency notified?
vii. As well as a list of who was notified—outside agencies and when they were notified;
viii. List of who investigated the incident;
ix. Photographs taken;
x. Diagrams made;
xi. Witnesses’ statements; and
xii. Conclusions, if supported by the investigation, should be developed regarding the physical cause of the incident, but should not deal with the placement of legal liability upon any party.

Step 7) Reporting Criminal or Suspicious Incidents:
i. All employees must report criminal incidents or suspicious activities to the Dispensary Manager and the Security Officer; and

ii. All criminal incidents must also be reported to the General Manager.

Step 8) While Dispensary is active:

i. Minimize door opening to reduce possible contamination.

ii. Keep area tidy, swept, and uncluttered – ensure waste materials are immediately disposed of according to Waste Disposal SOP.

iii. When handling medical marijuana, use new gloves.

iv. Tools and other equipment and surfaces should be lightly cleaned with 91% isopropyl alcohol daily.

Health and Safety Considerations:

- Refer to the MSDS for all chemicals when addressing exposure to any chemicals.
- All employees addressing an incident must wear appropriate personal protective equipment.

Records and Forms:

- Incident Report

Competency and Responsibility:

- Employee experience and training required:
  - Trained on the Dispensary – Incident Response and Management SOP and related equipment.
  - Clearance to work in the Dispensary.

- Employee with supervisory responsibility for this Standard Operating Procedure:
  - Dispensary Manager.
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LEGAL COMPLIANCE

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Background: Operating compliantly is critical to the success of the company and can be the difference between receiving a fine, disciplinary action and losing the permit altogether.

Purpose: To provide step-by-step instructions for the company’s protocols for maintaining legal compliance at the dispensary.

Scope: This document is designed to provide a formal outline of the procedures all dispensary personnel shall follow to ensure compliance with the company policy and regulatory agency regulations.

Related Standards and Procedures:
- Cleaning, Sanitation and Hygiene
- PRODUCT HANDLING AND STORAGE
- WASTE DISPOSAL

Definitions:
N/A

Procedure:

Step 1) The company will enact legal compliance practices according to the procedures described herein.

Step 2) The Compliance Officer is assigned responsibility for oversight of all regulatory compliance and for implementing and enforcing policies and procedures.

Step 3) Legal counsel must ensure the Compliance Officer is provided with necessary resources for completion of all assigned duties and regulatory compliance including third-party advisory services as necessary.
Step 4) Legal counsel must review and approve the compliance plan.
Step 5) Compliance plan describes the procedures to operate a registered medical marijuana operation in full compliance with the local codes and all Department regulations.

Step 6) Dependent upon organizational structure, all owners, officers, board members and all other members of the organization are subject to legal and Department provisions applicable to governing owners, officers and board members of the company.

Step 7) Only legal counsel may execute legal compliance documents on behalf of the company.

Step 8) Compliance Officer:
   i. Develop the compliance plan in accordance with the Department regulations.
   ii. Request approval of the compliance plan.
   iii. Written approval must be obtained from legal counsel prior to implementation of the compliance plan.
   iv. Assist legal counsel with updating and maintaining the compliance plan, as needed.

Step 9) Legal Counsel:
   i. The compliance plan is reviewed in accordance with the most current Department regulations to ensure all regulatory requirements have been met.
   ii. Provide guidance to the Compliance Officer, as needed, for development and implementation of compliance plan.
   iii. Maintain a copy of compliance plan for review by the regulatory agency.

Step 10) While Dispensary is active:
   i. Minimize door opening to reduce possible contamination.
   ii. Keep area tidy, swept, and uncluttered – ensure waste materials are immediately disposed of according to WASTE DISPOSAL.
   iii. When handling medical marijuana, use new gloves.
   iv. Tools and other equipment and surfaces should be lightly cleaned with 91% isopropyl alcohol daily or as necessary according to the Cleaning, Sanitation and Hygiene.
   v. Maintain climate control system to mitigate airborne contamination.
   vi. Use sanitary handling procedures in accordance with the requirements listed in procedure for PRODUCT HANDLING AND STORAGE.
   vii. Store packaging materials and medical marijuana appropriately to prevent contamination and adulteration.
   viii. Prevent cross-contamination and mix-ups between contaminated and unadulterated medical marijuana.
   ix. All cannabis and cannabis product waste from dispensary operations must be disposed of in accordance with the procedures for WASTE DISPOSAL.
Health and Safety Considerations:

- All dispensary employees will receive proper training prior to employment to ensure efficient and compliant procedures are upheld to the company’s standards.
- All employees are required to properly display a valid employee occupational license or registration card at all times while on the licensed premises of the dispensary facility.
- All work areas, contact surfaces, utensils and tools must be cleaned and sanitized prior to and after use according to the requirements listed in the procedure for Cleaning, Sanitation and Hygiene.
- All employees will receive a security briefing to ensure employees are aware of the seriousness of diversion.
- All employees must report any suspicion of theft or diversion to the Dispensary Manager, the Security Officer, or Compliance Officer immediately as a condition of employment.

Records and Forms:

- Compliance Plan

Competency and Responsibility:

- Employee experience and training required:
  - Trained on the Dispensary – Legal Compliance SOP and related equipment.
  - Clearance to work in the Dispensary.
- Employee with supervisory responsibility for this Standard Operating Procedure:
  - Dispensary Manager.
MARKETING AND ADVERTISING COMPLIANCE

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Background: Marketing and advertising of medical marijuana products is strictly controlled. To remain compliant with all of its marketing and advertising, the company will establish protocols for the marketing and advertising of its medical marijuana products.

Purpose: To provide step-by-step instructions for the company’s protocols for marketing and advertising medical marijuana products.

Scope: This document is designed to provide a formal outline of the procedures the Dispensary Manager shall follow to ensure compliance with the company policy and regulatory agency regulations.

Related Standards and Procedures:
- N/A

Definitions:
N/A

Procedure:

Step 1) The company will market and advertise medical marijuana according to the procedures described herein.

Step 2) Dispensary Manager:
   i. Request approval of all advertisements or promotions by submitting a copy of the advertisement or promotion to the General Manager and Chief Compliance Officer.
   ii. The request will include a complete description of the advertisement or promotion and how or where it will be used.
   iii. Written approval from the Chief Compliance Officer must be obtained prior to running any promotion.
Step 3) Chief Compliance Officer:

i. All marketing and advertising requests are reviewed in accordance with the most current regulatory agency regulations to ensure all regulatory requirements have been met.

ii. Any questions and/or concerns regarding the request must be directed to the company’s legal department for guidance and/or approval.

iii. Maintain a copy of all advertising and marketing promotions for review by the regulatory agency.

iv. Marketing efforts will be reviewed to ensure the target markets meet all regulatory agency regulations.

Step 4) While Dispensary is active:

i. Minimize door opening to reduce possible contamination.

ii. Keep area tidy, swept, and uncluttered – ensure waste materials are immediately disposed of according to WASTE DISPOSAL.

iii. When handling medical marijuana, use new gloves.

iv. Tools and other equipment and surfaces should be lightly cleaned with 91% isopropyl alcohol daily.

Health and Safety Considerations:

- N/A

Records and Forms:

- N/A

Competency and Responsibility:

- Employee experience and training required:
  - Trained on the Dispensary – Marketing and Advertising Compliance SOP and related equipment.
  - Clearance to work in the Dispensary.

- Employee with supervisory responsibility for this Standard Operating Procedure:
  - Dispensary Manager.
OPENING PROCEDURES

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Background: Opening procedures ensure the dispensary is ready for business prior to any patients or caregivers arrive.

Purpose: To provide step-by-step instructions for establishing the company’s protocols for opening the dispensary on any given day.

Scope: This document is designed to provide a formal outline of the procedures all dispensary personnel shall follow to ensure compliance with the company policy and regulatory agency regulations.

Related Standards and Procedures:
- Cleaning, Sanitation and Hygiene
- PRODUCT HANDLING AND STORAGE
- WASTE DISPOSAL

Definitions:
N/A

Procedure:

Step 1) The Dispensary will serve as the location of all opening activities according to the procedures described herein.

Step 2) Upon Arrival:
   i. Place belongings in designated area and retrieve employee occupational license or registration card.
   ii. Turn on computer and log into the electronic tracking system for Clock In.
   iii. Turn on printers, scanners and other applicable equipment.
iv. Conduct a walk-through of the facility to determine if there may have been any suspicious activity overnight. If needed, contact the Dispensary Manager immediately to report the activity.

Step 3) Environment:
   i. Organize printed materials,
   ii. Clear desk of clutter, and
   iii. File documents as necessary to ensure the reception and front desk area is clean and presentable.
   iv. A clean and organized reception area must be maintained at all times.

Step 4) Communications:
   i. Check emails, voicemails, and return all messages.
      a. Diligent follow-up is required.
   ii. Review the Question Guide and, if needed, consult the Dispensary Manager as soon as possible for any outstanding questions.
   iii. Answer phones:
      a. “Thank you for calling, “COMPANY”, this is ____, how may I help you”?

Step 5) While Dispensary is active:
   i. Minimize door opening to reduce possible contamination.
   ii. Keep area tidy, swept, and uncluttered – ensure waste materials are immediately disposed of according to WASTE DISPOSAL.
   iii. When handling medical marijuana, use new gloves.
   iv. Tools and other equipment and surfaces should be lightly cleaned with 91% isopropyl alcohol daily or as necessary according to the Cleaning, Sanitation and Hygiene.
   v. Maintain climate control system to mitigate airborne contamination.
   vi. Use sanitary handling procedures in accordance with the requirements listed in procedure for PRODUCT HANDLING AND STORAGE.
   vii. Store packaging materials and medical marijuana appropriately to prevent contamination and adulteration.
   viii. Prevent cross-contamination and mix-ups between contaminated and unadulterated medical marijuana.
   ix. All cannabis and cannabis product waste from dispensary operations must be disposed of in accordance with the procedures for WASTE DISPOSAL.

Health and Safety Considerations:

- All dispensary employees will receive proper training prior to employment to ensure efficient and compliant procedures are upheld to the company’s standards.
- All employees must maintain a sharp awareness when entering and leaving the dispensary facility and avoid arriving or leaving alone whenever possible.
All employees are required to properly display a valid employee occupational license or registration card at all times while on the licensed premises of the dispensary facility.

All work areas, contact surfaces, utensils and tools must be cleaned and sanitized prior to and after use according to the requirements listed in the procedure for **Cleaning, Sanitation and Hygiene**.

All product handling and storage must be done in accordance with the requirements listed in procedure for **PRODUCT HANDLING AND STORAGE**.

**Records and Forms:**

- Question Guide

**Competency and Responsibility:**

- Employee experience and training required:
  - Trained on the Dispensary – Opening Procedures SOP and related equipment.
  - Clearance to work in the Dispensary.

- Employee with supervisory responsibility for this Standard Operating Procedure:
  - Dispensary Manager.
PROCESSING TRANSACTIONS

Standard Operating Procedure No.: KIC_SOP_XXXX
Revision No.: 0
Original Date of Issue: 03-20-2017
Revision Date: XX-XX-XXXX

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Background: To streamline transactions, the company has established protocols for the processing of cash and credit card transactions.

Purpose: To provide step-by-step instructions for establishing the company’s protocols for processing transactions.

Scope: This document is designed to provide a formal outline of the procedures all dispensary personnel shall follow to ensure compliance with the company policy and regulatory agency regulations.

Related Standards and Procedures:

- Cleaning, Sanitation and Hygiene
- PRODUCT HANDLING AND STORAGE
- PURCHASE RESTRICTIONS
- WASTE DISPOSAL

Definitions:

“Sales Area” refers to the area onsite where cash or credit is transferred in exchange for medical marijuana.

Procedure:

Step 1) The Sales Area within the Dispensary will serve as the location of all transactions according to the procedures described herein.

Step 2) Patient Sales Verification:

i. Verify the order’s contents do not exceed the patient’s authorized quantity as indicated on the Patient Sales Information Card, and

ii. Provide the customer with their patient’s sales information card with the order basket.
Step 3) Using the Electronic Tracking System:
   i. Make sure each product (or item) is scanned individually.
      a. Example, if you have multiple items of the same product, you must scan each item individually;
   ii. The total price must include all state and local sales tax;
   iii. Always take your time with handling money and using the debit machine;
   iv. The Dispensary Manager will provide contact information to the appropriate support service if there are any issues with the electronic tracking system; and
   v. Make sure you logout when you are not working in the sales station.

Step 4) Entry into State Sales Portal:
   i. After the transaction is complete in the electronic tracking system, log into the state’s sales portal;
   ii. If a patient order, enter the State resident’s cannabis card number or the out-of-state patient’s driver’s license number into the electronic tracking system; and
   iii. Enter the quantity of products purchased in the electronic tracking system.

Step 5) Electronic Tracking System Crash Procedures:
   i. If the electronic tracking system is not working, you may have to manually apply the labels to the product packages;
   ii. Handwriting Sales Tickets:
      a. You will be using carbon copy tickets, similar to the ones used for pre-orders.
      b. In the center of the ticket, list the products being purchased with the post-tax price.
      c. In the bottom left corner, list the pre-tax price.
      d. If you have any questions about the tax rate and calculation, consult with the Dispensary Manager.
      e. Record all sales completed during the system crash on the Back Up Sales Log.
   iii. Once payment is complete:
      a. Place the cash or the debit receipt with the white copy of the handwritten ticket.
      b. Keep every order neatly separated so it is easy to ring up later.
      c. Provide the yellow carbon copy to the customer as their receipt.
      d. Affix a pre-printed label to each product.
      e. You will need to fill in for each label:
         1. Date,
         2. Patient # or caregiver #, if applicable, and
         3. Package ID (the SKU listed below the barcode on each product or the back of the jar).
iv. When the electronic tracking system comes back online, each order will need to be immediately rung through the registers online. To do this, refer back to each paper ticket.

Step 6) Processing Card Payments:
   i. Notify customer of additional service fees to use a debit card.
      a. Explain the cashless ATM system only allows increments of $5 and they will be provided the difference in cash if necessary.
   ii. Swipe the debit card before finalizing the transaction in the electronic tracking system;
   iii. Give customer the number pad attached to the debit machine;
   iv. Prompt them to enter their PIN number;
   v. Press the green button;
   vi. Give customer change, if applicable;
   vii. Have customer sign the dispensaries copy of the receipt;
   viii. Give customer their copy of receipt; and
   ix. Store receipt under drawer in cash register.

Step 7) While Dispensary is active:
   i. Minimize door opening to reduce possible contamination.
   ii. Keep area tidy, swept, and uncluttered – ensure waste materials are immediately disposed of according to WASTE DISPOSAL.
   iii. When handling medical marijuana, use new gloves.
   iv. Tools and other equipment and surfaces should be lightly cleaned with 91% isopropyl alcohol daily or as necessary according to the Cleaning, Sanitation and Hygiene.
   v. Maintain climate control system to mitigate airborne contamination.
   vi. Use sanitary handling procedures in accordance with the requirements listed in procedure for PRODUCT HANDLING AND STORAGE.
   vii. Store packaging materials and medical marijuana appropriately to prevent contamination and adulteration.
   viii. Prevent cross-contamination and mix-ups between contaminated and unadulterated medical marijuana.
   ix. All cannabis and cannabis product waste from dispensary operations must be disposed of in accordance with the procedures for WASTE DISPOSAL.

Health and Safety Considerations:

- All dispensary employees will receive proper training prior to employment to ensure efficient and compliant procedures are upheld to the company’s standards.
- All employees must maintain a sharp awareness when entering and leaving the dispensary facility and avoid arriving or leaving alone whenever possible.
- All employees are required to properly display a valid employee occupational license or registration card at all times while on the licensed premises of the dispensary facility.
• All work areas, contact surfaces, utensils and tools must be cleaned and sanitized prior to and after use according to the requirements listed in the procedure for Cleaning, Sanitation and Hygiene.
• All product handling and storage must be done in accordance with the requirements listed in procedure for PRODUCT HANDLING AND STORAGE.

Records and Forms:
• Back Up Sales Log
• Patient’s Sales Information Card

Competency and Responsibility:
• Employee experience and training required:
  o Trained on the Dispensary – Processing Transactions SOP and related equipment.
  o Trained on the Electronic Tracking System and manual transactions and related equipment.
  o Clearance to work in the Dispensary.
• Employee with supervisory responsibility for this Standard Operating Procedure:
  o Dispensary Manager.
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Background: Complaints are common place in the consumer products industry. Medical marijuana products are not different and will inevitably receive complaints.

Purpose: To provide step-by-step instructions for establishing the company’s protocols for handling product complaints.

Scope: This document is designed to provide a formal outline of the procedures the Dispensary Manager shall follow to ensure compliance with the company policy and regulatory agency regulations.

Related Standards and Procedures:
- Cleaning, Sanitation and Hygiene
- PRODUCT COMPLAINTS
- PRODUCT HANDLING AND STORAGE
- RECALL AND WITHDRAWAL
- WASTE DISPOSAL

Definitions:
N/A

Procedure:
Step 1) The company will make a good faith effort to resolve any complaints according to the procedures described herein.

Step 2) Complaint Handling:
   i. An employee may receive a complaint in person, by phone or via email. The employee must listen carefully and write down as much information about the complaint as
possible, including the time and date of complaint, the name and contact information for the complainant, and the subject matter;

ii. Any employee receiving a complaint must immediately inform the Dispensary Manager;

iii. The Dispensary Manager, or an employee designated by the Dispensary Manager, must record the initial complaint information recorded by the employee receiving the complaint in the Complaint Log;

iv. Based on the available information, the Dispensary Manager must categorize the complaint as a product complaint or other complaint. Product complaints include, but are not limited to:

   a. Dispensing errors,
   b. Bad patient reactions, and
   c. Quality-related product complaints.

   d. Complaints classified as “other” may include, but are not limited to:

      1. Neighborhood-related issues,
      2. General service-related issues,
      3. Grievances with a particular employee, or
      4. Other issues related to dispensary operations but not medical marijuana specifically.

v. The Dispensary Manager must respond to any complaint within twenty-four (24) hours by contacting the complainant to gather additional information and discuss the complainant’s desires for resolving the issue;

vi. If the complaint is product-related, the Dispensary Manager must follow the procedures for PRODUCT COMPLAINTS;

vii. The Dispensary Manager must use his or her discretion and complainant input to determine the appropriate steps for resolution. If the Dispensary Manager cannot fully resolve the issue or is unsure about appropriate steps for resolution, upper management must be notified and shall determine the appropriate course of action; and

viii. The Dispensary Manager must record all measures taken to resolve the complaint in the Complaint Log.

Step 3) Product Complaint Investigation - Once notification of a product complaint has been received, the Dispensary Manager must:

i. Contact the complainant and gather information about the nature of the product complaint, including the product(s) involved, the persons affected, and whether the situation involved an adverse patient reaction, a quality-related issue, or a dispensing error;

ii. Record the information gathered in the Complaint Log;

iii. Assemble the personnel or experts needed to conduct a product complaint investigation, if necessary;

iv. Conduct a thorough investigation into the complaint;

v. Determine the nature and potential causes of the problem;
vi. Determine any other products that may potentially be affected;

vii. Enter all information into the Complaint Log; and

viii. Determine the appropriate action, based on the general classifications provided below.

   a. Product Recall: Product poses safety or health risk to patients due to physical, chemical, biological or immunological cause(s). This includes, but is not limited to, verified or suspected product contamination. Proceed to RECALL AND WITHDRAWAL procedure;

   b. Product Withdrawal: Quality-related issue with affected product(s) that does not pose an immediate health or safety risk to patients. Proceed to RECALL AND WITHDRAWAL procedure; or

   c. Isolated Incident: An isolated incident with the affected product(s), such as an isolated dispensing error, labeling error or quality-related issue. Use discretion to determine appropriate measures for resolution, which may include a refund or product exchange.

Step 4) Record all measures taken to resolve the complaint in the Complaint Log.

Step 5) While Dispensary is active:

i. Minimize door opening to reduce possible contamination.

ii. Keep area tidy, swept, and uncluttered – ensure waste materials are immediately disposed of according to WASTE DISPOSAL.

iii. When handling medical marijuana, use new gloves.

iv. Tools and other equipment and surfaces should be lightly cleaned with 91% isopropyl alcohol daily or as necessary according to the Cleaning, Sanitation and Hygiene.

v. Maintain climate control system to mitigate airborne contamination.

vi. Use sanitary handling procedures in accordance with the requirements listed in procedure for PRODUCT HANDLING AND STORAGE.

vii. Store packaging materials and medical marijuana appropriately to prevent contamination and adulteration.

viii. Prevent cross-contamination and mix-ups between contaminated and unadulterated medical marijuana.

ix. All cannabis and cannabis product waste from dispensary operations must be disposed of in accordance with the procedures for WASTE DISPOSAL.

Health and Safety Considerations:

- All dispensary employees will receive proper training prior to employment to ensure efficient and compliant procedures are upheld to the company’s standards.

- All employees are required to properly display a valid employee occupational license or registration card at all times while on the licensed premises of the dispensary facility.
- All work areas, contact surfaces, utensils and tools must be cleaned and sanitized prior to and after use according to the requirements listed in the procedure for **Cleaning, Sanitation and Hygiene**.
- All product handling and storage must be done in accordance with the requirements listed in procedure for **PRODUCT HANDLING AND STORAGE**.

**Records and Forms:**
- Complaint Log

**Competency and Responsibility:**
- Employee experience and training required:
  - Trained on the Dispensary – Product Complaints SOP and related equipment.
  - Clearance to work in the Dispensary.
- Employee with supervisory responsibility for this Standard Operating Procedure:
  - Dispensary Manager.
PURCHASE RESTRICTIONS

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Background: Purchasing restrictions are setup to ensure patients and/or caregivers are not misusing medical marijuana and to provide the company with a level protection from customers who intend to misuse their products.

Purpose: To provide step-by-step instructions for the company’s protocols for restricting the purchases made by any given patient or caregiver.

Scope: This document is designed to provide a formal outline of the procedures all dispensary personnel shall follow to ensure compliance with the company policy and regulatory agency regulations.

Related Standards and Procedures:
- Cleaning, Sanitation and Hygiene
- GENERAL PACKAGING AND LABELING REQUIREMENTS
- PRODUCT HANDLING AND STORAGE
- WASTE DISPOSAL

Definitions: N/A

Procedure:

Step 1) The Dispensary will act as the location where purchasing restrictions for each patient and caregiver will occur according to the procedures described herein.

Step 2) Purchase Restrictions:

i. The maximum allowable quantity of medical marijuana in the “State” is an amount that is equivalent to XX ounces of usable medical marijuana in any one 30-day period; and

ii. An employee may not override the limit restriction.
Step 3) Scan Products for Purchase:
   i. Using the barcode scanner, scan each medical marijuana product individually for inventory.
      a. Example, if a customer purchases three (3) packets of the same type of patch, you cannot scan the same packet three times, each packet must be scanned individually.

Step 4) Discount and Pricing:
   i. Apply any discounts that may apply to the customer’s order in the electronic tracking system.

Step 5) Labels:
   i. Print and apply the proper regulatory agency mandated label(s) to all products.
   ii. Ensure all labels are fully visible and readable.
      a. Example, do not wrap a label around a cylindrical item such as a vaporizer pen. Instead, apply the label as flat as possible to the connecting cardboard or paper container. See the reference guide section Packaging and Labeling Rules and Regulations.

Step 6) Receipts:
   i. Every customer must be given a receipt (by law).
   ii. Processing the transaction must keep a copy of each receipt.
   iii. At the end of the shift, the cashier must attach all receipts to his or her Electronic Tracking System Summary Sheet and put in the appropriate area for the recorder or accountant to handle; and
   iv. When checking out each cashier at the end of his or her shift, the Dispensary Manager must ensure all receipts are attached to the cashier’s electronic tracking system summary sheet.

Step 7) Packaging:
   i. All products must be contained and sealed within a compliant, child-resistant bag before exiting the dispensary;
   ii. The exit bag may need to be opaque, resealable, and ASTM approved;
   iii. Customers may pay a small fee for the package or bring in their own;
      a. If so, enter the CPU code to add the item to the checkout list before finalizing purchase, if applicable.
   iv. If an employee is unsure if the package a customer has brought in is compliance, he/she must consult with the Dispensary Manager; and
   v. The entire order is then bagged up to deter the customer from opening it while on the premises. See procedure for GENERAL PACKAGING AND LABELING REQUIREMENTS and the reference guide section Packaging and Labeling Rules and Regulations.
Step 8) While Dispensary is active:
   i. Minimize door opening to reduce possible contamination.
   ii. Keep area tidy, swept, and uncluttered – ensure waste materials are immediately disposed of according to WASTE DISPOSAL.
   iii. When handling medical marijuana, use new gloves.
   iv. Tools and other equipment and surfaces should be lightly cleaned with 91% isopropyl alcohol daily.

Health and Safety Considerations:

- The Dispensary Manager is assigned responsibility for oversight of all purchase restrictions and will inform employees regarding the legal purchase restrictions, the electronic tracking system features that prevent excess purchases, and train employees on purchase procedures.
- All employees are required to properly display a valid employee occupational license or registration card at all times while on the licensed premises of the dispensary facility.
- All work areas, contact surfaces, utensils and tools must be cleaned and sanitized prior to use according to the requirements listed in the procedure for “Cleaning, Sanitation and Hygiene”.

Records and Forms:

- Electronic Tracking System Summary Sheet
- Packaging and Labeling Rules and Regulations

Competency and Responsibility:

- Employee experience and training required:
  o Trained on the Dispensary – Purchase Restrictions SOP and related equipment.
  o Clearance to work in the Dispensary.
- Employee with supervisory responsibility for this Standard Operating Procedure:
  o Dispensary Manager.
QUALITY CONTROL

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Background: Quality control measures will be established by the company to ensure no products leave the dispensary in sub-par quality, mislabeled, misbranded, damaged or expired.

Purpose: To provide step-by-step instructions for the company’s quality control practices.

Scope: This document is designed to provide a formal outline of the procedures all dispensary personnel shall follow to ensure compliance with the company policy and regulatory agency regulations.

Related Standards and Procedures:
- Cleaning, Sanitation and Hygiene
- PRODUCT HANDLING AND STORAGE
- WASTE DISPOSAL

Definitions:

N/A

Procedure:

Step 1) The company will enact quality control measures for its dispensary operations according to the procedures described herein.

Step 2) Employees working directly with medical marijuana in the dispensary must be trained to identify signs of contamination and sub-standard product. The Dispensary Manager is responsible for training employees and oversight of all quality control activities.

Step 3) The Dispensary Manager must approve the disposal of any medical marijuana in accordance with the requirements listed in procedure for WASTE DISPOSAL.
Step 4) All medical marijuana packaging is to be inspected to ensure the product is contained within a resealable, childproof, opaque and tamper-evident package that is properly labeled according to the Packaging and Labeling Rules and Regulations.

Step 5) All medical marijuana is to be inspected to ensure the product is not expired, damaged, opened or otherwise adulterated.

Step 6) The inspection of medical marijuana must be conducted in an area with sufficient lighting to allow for adequate inspection.

Step 7) Medical marijuana with non-compliant packaging and labeling or that has been damaged and/or expired must be removed and disposed of with Dispensary Manager approval and in accordance with the requirements listed in procedure for WASTE DISPOSAL.

Step 8) While Dispensary is active:
   i. Minimize door opening to reduce possible contamination.
   ii. Keep area tidy, swept, and uncluttered – ensure waste materials are immediately disposed of according to WASTE DISPOSAL.
   iii. When handling medical marijuana, use new gloves.
   iv. Tools and other equipment and surfaces should be lightly cleaned with 91% isopropyl alcohol daily or as necessary according to the Cleaning, Sanitation and Hygiene.
   v. Maintain climate control system to mitigate airborne contamination.
   vi. Use sanitary handling procedures in accordance with the requirements listed in procedure for PRODUCT HANDLING AND STORAGE.
   vii. Store packaging materials and medical marijuana appropriately to prevent contamination and adulteration.
   viii. Prevent cross-contamination and mix-ups between contaminated and unadulterated medical marijuana.
   ix. All cannabis and cannabis product waste from dispensary operations must be disposed of in accordance with the procedures for WASTE DISPOSAL.

Health and Safety Considerations:

- All product handling and storage must be done in accordance with the requirements listed in procedure for PRODUCT HANDLING AND STORAGE.
- All employees are required to properly display a valid employee occupational license or registration card at all times while on the licensed premises of the dispensary facility.
- All work areas, contact surfaces, utensils and tools must be cleaned and sanitized prior to use according to the requirements listed in the procedure for Cleaning, Sanitation and Hygiene.

Records and Forms:

- Packaging and Labeling Rules and Regulations
Competency and Responsibility:

- Employee experience and training required:
  - Trained on the Dispensary – Quality Control SOP and related equipment.
  - Clearance to work in the Dispensary.

- Employee with supervisory responsibility for this Standard Operating Procedure:
  - Dispensary Manager.
# RECALL AND WITHDRAWAL

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**Background:** The company will adhere to an adopted step-by-step plan for the recall of any products that have a reasonable probability of causing adverse health consequences based on a testing result, bad customer reaction, or other reason. The general manager is assigned the responsibility for the evaluation and execution of product concerns brought to his/her attention and initiate any necessary product recalls or withdrawals. The compliance officer is assigned the responsibility for oversight of the proper execution of any product recall or withdrawals and their timely reporting to the regulatory agency. A recall coordinator is to be appointed by the general manager and members of the recall team will be identified from the various functional areas. If the general manager is unsure of the need for withdrawal or recall or of the correct event classification, the company chief executive officer or executive board must be contacted immediately for a decision. The chief executive officer or executive board may engage the services of an expert to assist the process. Any determination by the general manager to implement recall procedures must be supported by test results or other scientific documentation or expert opinion.

**Purpose:** To provide step-by-step instructions for the company’s protocols for the withdrawal and recall of medical marijuana products.

**Scope:** This document is designed to provide a formal outline of the procedures all dispensary personnel shall follow to ensure compliance with the company policy and regulatory agency regulations.

**Related standards and procedures:**

- ADVERSE EVENT
- Cleaning, Sanitation and Hygiene
- PRODUCT COMPLAINTS
- PRODUCT HANDLING AND STORAGE
- QUALITY CONTROL
- WASTE DISPOSAL
Definitions:

“Recall” is generally undertaken to protect consumer health and safety. A recall typically involves the presence of bacteria or a substance that may cause a potential adverse health reaction. The term “recall” should be used carefully and only when regulatory agency regulations mandate. Otherwise, the term withdrawal must be used.

“Withdrawal” is conducted for quality purposes or as a precautionary measure before an official recall is implemented.

Procedure:

Step 1) The company will enact product recall and withdrawal measures for its dispensary operations according to the procedures described herein.

Step 2) The following examples would constitute an incident requiring a withdrawal or recall:
   i. Product found with a pesticide residue for an illegal/restricted chemical;
   ii. Product found with a pesticide residue above permitted legal limits;
   iii. Known, assumed or suspected product contamination by chemical, physical or microbiological hazards;
   iv. Incorrect labeling which may constitute a breach in food safety, quality or legality standards;
   v. Notification from a supplier than any of the above had occurred to product prior to supply; and
   vi. Malicious contamination.

Step 3) Investigate complaint:
   i. Gather information from the customer, supplier, or regulator about the nature of the product complaint;
   ii. General manager must assemble the employees or experts needed to conduct a product complaint investigation;
   iii. Conduct a thorough investigation into the problem with the affected product;
   iv. Determine the nature and potential causes of the problem;
   v. Determine any other product(s) that may potentially be affected; and
   vi. Determine, from the criteria below, whether the situation constitutes:
      a. **Product Recall**: a food safety or health risk due to physical, chemical, biological or immunological cause(s),
      b. **Product Withdrawal**: a quality-related issue with the affected product(s), or
      c. **No Corrective Actions**: an isolated incident with the affected product(s).
   vii. (according to the appropriate state division of public health, heavy metal limits will follow the standards of the *american herbal pharmacopoeia cannabis inflorescence standards of identity, analysis and quality control*, which take precedence over the heavy metals limits set forth in state regulations).
Step 4) Notify legal counsel, insurance company, and Chief Executive Officer:
   i. The General Manager must notify legal counsel that a situation meets the criteria for a withdrawal or recall.
   ii. The Chief Executive Officer must approve any recommendations by counsel for alternative procedures;
   iii. The General Manager must notify the insurance company and determine coverage; and
   iv. The General Manager must notify the Chief Executive Officer of his/her findings and discuss event classification.

Step 5) Assess and classify event:
   i. Conduct an assessment to determine the procedures to implement. Items to consider include:
      a. Whether or not disease or injuries have already occurred from use of the product;
      b. Hazard to various segments of the population (e.g. Immunocompromised patients) who are expected to be exposed to the product being considered;
      c. Degree of seriousness of the health hazard to which the population at risk would be exposed; and
      d. Likelihood of occurrence of hazard.

Step 6) Assign event to the following classes:
   i. Class 1: an emergency situation involving removal from the market of products in which the consequences of use or exposure to the product are life-threatening or involve a serious adverse health consequence;
   ii. Class 2: a situation in which the use of, or exposure to, a contaminated product may cause temporary adverse health consequences or where the probability of serious adverse health consequence is remote (ex: pathogenic bacterial population, exclusive of c. Botulinum, adequate to cause food poisoning);
   iii. Class 3: a situation in which the use of, or exposure to, the product is not likely to cause adverse health consequences (ex: a non-hazardous labeling violation); and
   iv. Seek Chief Executive Officer approval for the event classification.
      a. If the Chief Executive Officer approves a recall, they must issue a press release to the regulatory agency immediately.

Step 7) Determine type of product(s) affected:
   i. Finished Product = all products that have been partially or completely distributed, including products for sale in dispensary,
   ii. Work in Progress = all products that have not been distributed, including but not limited to vegetative and flowering plants, cannabis in storage, and infused oils and/or butters in storage;
   iii. Ingredient = all ingredients for dispensary or manufacturing; and
iv. **Packaging Material** = all packaging material or containers used for work in progress or finished products.

**Step 8) Finished Product** affected product:

i. Assemble employee needed to conduct tracking of a finished product;

ii. Identify affected and any other potentially affected product(s), product code(s) and production date(s);

iii. Determine the quantity of affected product(s) produced;

iv. Determine from the electronic tracking system the last day of shipment/distribution (if applicable, also patient and caregiver) for the affected product(s);

v. Determine from the electronic tracking system all patients, caregivers and licensees who purchased the affected product(s) during this period (i.e. Period = day of packaging to last day of shipment); and

vi. Determine from the electronic tracking system the remaining quantity of the affected product(s) in company inventory.

**Step 9) Work in Progress** affected product:

i. Assemble the employees needed to conduct tracking of a work-in-progress product.

ii. Identify the affected and any other potentially affected product(s), product code(s) and production date(s) from the production records.

iii. Determine from the electronic tracking system and production records the quantity of the affected product(s) produced.

iv. Locate the affected product(s) from the dispensary area, storage areas, cooler(s), freezer(s), etc.

**Step 10) Ingredient based** affected product:

i. Assemble the employee needed to conduct tracking of an ingredient;

ii. Identify the affected and any other potentially affected ingredient(s) and lot number(s)/production code(s)/best before date(s)/receiving date(s);

iii. Determine the quantity and receiving date of the affected ingredient(s) received;

iv. Based on the lot number and receiving date, determine from the production records the period of use for the ingredient;

v. Determine from the production records all the finished product(s) produced by the affected ingredient(s);

vi. Determine from the production records the quantity of the affected product(s) produced during this period;

vii. Determine from the production records and inventory records the day the affected product(s) entered company inventory (i.e. Packaging date);

viii. Determine from the electronic tracking system the last day of shipment (and the customer) for the affected product(s);
ix. Determine from the electronic tracking system all the patients or designated caregivers who purchased the affected product(s) during this period (i.e. Period = day of packaging to last day of shipment); and

x. Determine from the electronic tracking system the remaining quantity of the affected product(s) in company inventory).

Step 11) 

Packaged Material affected product:

i. Identify affected and any other potentially affected packaging material(s) and lot number(s)/quality control code/receiving date(s);

ii. Determine the quantity and receiving date of the affected packaging material(s) received;

iii. Based on the type and size of packaging material, determine all the finished product(s) associated with the affected packaging material(s);

iv. Determine from the production records the period of use for the affected packaging material(s);

v. Given the affected period and product, determine from the electronic tracking system the quantity of the affected product(s) associated with the affected packaging material(s) in this period;

vi. Determine from the production records and electronic tracking system the day the affected product(s) entered into company inventory (i.e. Packaging date);

vii. Determine from the electronic tracking system the last day of shipment (and the patient or designated caregiver) for the affected product(s);

viii. Determine from the electronic tracking system all the patients or designated caregivers who purchased the affected product(s) during this period (i.e. Period = day of packaging to last day of shipment);

ix. Determine from the electronic tracking system the remaining quantity of the affected product(s) in our inventory; and

x. Locate any remaining affected packaging material(s) from the storage shelves and cabinets.

Step 12) 

Execute Withdrawal or Product Recall:

i. Assemble the withdrawal or recall team ensuring adequate resources are available for the severity of the issue;

ii. Gather all information collected in the tracking process;

iii. Ensure the following information is accurately provided:
   a. Name and product code of the withdraw/recalled product(s);
   b. Production date(s) of the withdraw/recalled product(s);
   c. Reason for the withdrawal/recall;
   d. Quantity of withdraw/recalled product(s) distributed;
   e. Quantity of withdraw/recalled product(s) in inventory (for internal use only); and
f. Area(s) of distribution as well as patients or designated caregivers affected (for internal use only).

iv. Detain and segregate all products to be recalled, which are in our control.

v. Adhere a Do Not Distribute sign and complete any relevant internal logs/forms;

vi. Send a Notification of Recall to the affected patient or designated caregiver; and

vii. Notify the regulatory agency within twenty-four (24) hours.

viii. Coordinate and monitor the recovery of all affected product(s);

ix. Products in the homes of patients or caregivers should be picked up by company employees in accordance with regulatory agency regulations.

x. Reconcile the total quantity of recalled product and affected product in inventory against the total quantity produced.

xi. Randomly remove and submit samples of recalled product(s) to an independent laboratory for testing as appropriate.

xii. Collect testing results and discuss the results and corrective actions that may be required with the regulatory agency.

xiii. The general manager must prepare a Withdrawal and Recall Report.

xiv. Complete all cleaning and sanitation procedures according to the requirements listed in the procedure for Cleaning, Sanitation and Hygiene.

Step 13) While Dispensary is active:

i. Minimize door opening to reduce possible contamination.

ii. Keep area tidy, swept, and uncluttered – ensure waste materials are immediately disposed of according to Waste Disposal.

iii. When handling medical marijuana, use new gloves.

iv. Tools and other equipment and surfaces should be lightly cleaned with 91% isopropyl alcohol daily or as necessary according to the Cleaning, Sanitation and Hygiene.

v. Maintain climate control system to mitigate airborne contamination.

vi. Use sanitary handling procedures in accordance with the requirements listed in procedure for Product Handling and Storage.

vii. Store packaging materials and medical marijuana appropriately to prevent contamination and adulteration.

viii. Prevent cross-contamination and mix-ups between contaminated and unadulterated medical marijuana.

ix. All cannabis and cannabis product waste from dispensary operations must be disposed of in accordance with the procedures for Waste Disposal.

Health and Safety Considerations:

- All product handling and storage must be done in accordance with the requirements listed in procedure for Product Handling and Storage.
- All employees are required to properly display a valid employee occupational license or registration card at all times while on the licensed premises of the dispensary facility.
• All work areas, contact surfaces, utensils and tools must be cleaned and sanitized prior to use according to the requirements listed in the procedure for Cleaning, Sanitation and Hygiene.

Records and Forms:

• American Herbal Pharmacopoeia Cannabis Inflorescence Standards of Identity, Analysis and Quality Control
• Inventory Records
• Production Records
• Notification of Recall
• Waste Disposal Log
• Withdrawal and Recall Report

Competency and Responsibility:

• Employee experience and training required:
  o Trained on the Dispensary – Recall and Withdrawal SOP and related equipment.
  o Clearance to work in the Dispensary.
• Employee with supervisory responsibility for this Standard Operating Procedure:
  o Dispensary Manager.
RECEIPT AND ACKNOWLEDGEMENT

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**Background:** To promote accountability among company employees, the company will establish an receipt and acknowledgment program. This program will prevent any employee from claiming they were unaware or not trained to handle an assigned task.

**Purpose:** To provide step-by-step instructions for the company’s protocols for the receipt and acknowledgement of training and other materials by its employees.

**Scope:** This document is designed to provide a formal outline of the procedures all dispensary personnel shall follow to ensure compliance with the company policy and regulatory agency regulations.

**Related Standards and Procedures:**
N/A

**Definitions:**
N/A

**Procedure:**

Step 1) The company will enact receipt and acknowledgement measures for its dispensary employees according to the procedures described herein.

Step 2) Dispensary Manager Responsibility:

i. Provide employees with the Employee Manual and Receipt of Acknowledgement.

ii. Ensure employees are provided the appropriate and updated Standard Operating Procedures for their specific area(s) of responsibility.

iii. Immediately address any questions and/or concerns from employees.

iv. Ensure the employee signs and returns the Receipt of Acknowledgement.
v. Provide a copy of the signed Receipt and Acknowledgement document to the Human Resources department.
vi. Place the original signed Receipt and Acknowledgement document in the employee’s personnel file at the dispensary.

Step 3) Employee Responsibility:
i. Thoroughly read the company Employee Manual and all assigned Standard Operating Procedures.
ii. Address all questions with the Human Resources department, prior to signing the Receipt and Acknowledgement document.

Step 4) Human Resources Department Responsibility
i. Ensure employee is provided the appropriate and updated Employee Manual.
ii. Immediately address any questions and/or concerns from the employee.
iii. Place the signed Receipt and Acknowledgement document in the employee’s personnel file.

Step 5) While Dispensary is active:
i. Minimize door opening to reduce possible contamination.
ii. Keep area tidy, swept, and uncluttered – ensure waste materials are immediately disposed of according to WASTE DISPOSAL.
iii. When handling medical marijuana, use new gloves.
iv. Tools and other equipment and surfaces should be lightly cleaned with 91% isopropyl alcohol daily or as necessary according to the Cleaning, Sanitation and Hygiene.
v. Maintain climate control system to mitigate airborne contamination.
vi. Use sanitary handling procedures in accordance with the requirements listed in procedure for PRODUCT HANDLING AND STORAGE.
vii. Store packaging materials and medical marijuana appropriately to prevent contamination and adulteration.
viii. Prevent cross-contamination and mix-ups between contaminated and unadulterated medical marijuana.
ix. All cannabis and cannabis product waste from dispensary operations must be disposed of in accordance with the procedures for WASTE DISPOSAL.

Health and Safety Considerations:

N/A

Records and Forms:

- Employee Manual
- Receipt and Acknowledgement Form
Competency and Responsibility:

- Employee experience and training required:
  - Trained on the Dispensary – Receipt and Acknowledgement SOP and related equipment.
  - Clearance to work in the Dispensary.
- Employee with supervisory responsibility for this Standard Operating Procedure:
  - Dispensary Manager.
**RECORDKEEPING**

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**Background:** The company will make its books and records available to the regulatory agency or its authorized representatives upon request for monitoring, onsite inspection and audit purposes. The company will maintain back-up records for a minimum of five (5) years and will be made available to the appropriate regulatory agency, upon request.

**Purpose:** To provide step-by-step instructions for the company’s protocols for proper recordkeeping.

**Scope:** This document is designed to provide a formal outline of the procedures all dispensary personnel shall follow to ensure compliance with the company policy and regulatory agency regulations.

**Related Standards and Procedures:**

- Cleaning, Sanitation and Hygiene
- PRODUCT HANDLING AND STORAGE
- WASTE DISPOSAL

**Definitions:**

N/A

**Procedure:**

Step 1) The Dispensary will be used to conduct all of the recordkeeping methods according to the procedures described herein.

Step 2) The company shall maintain, at a minimum, the following categories of records:

i. Standard operating procedures;

ii. Inventory records including seed to sale tracking;

iii. Confidential patient and caregiver records including:
a. Electronic tracking system patient and caregiver profiles and dispensing history;  
b. All dispensed medical marijuana products and periods of no-fill (zero report);  
c. Dispensing errors;  
d. Allergy and adverse event reporting; and  
e. Medical marijuana product recalls.  

iv. Employee records and policies;  
v. Waste disposal records;  
vi. Maintenance records; and  

Step 3) Business Records include:  

i. The company’s assets and liabilities;  
ii. Fixed asset schedules;  
iii. Insurance and escrow requirements;  
iv. All monetary transactions;  
v. Books of accounts including journals, ledgers, and supporting documents, agreements, checks, invoices, vouchers, monthly and quarterly reports, and annual audits;  
vi. Sales records;  
vii. Salary and wages paid to each employee, stipend paid to each executive manager, and any executive compensation, bonus, benefit, or item of value paid to any individual affiliated with the company;  
viii. All licensing documentation and other correspondence with the regulatory agency; and  
ix. All other corporate documents required by law including but not limited to meeting minutes, annual reports, stock or membership agreements.  

Step 4) Dispensary Manager Responsibilities:  

i. Ensure true and correct records of all dispensary records at the facility are maintained in a timely and organized manner.  

Step 5) Controller Responsibilities:  

i. Ensure true and correct records of the company are maintained in a timely and organized manner.  
ii. Shall provide real-time operating information to management necessary to make quick and informed decisions in the normal course of business.  
iii. Submit software requests to the General Manager for approval.  

Step 6) Chief Operating Officer (COO) Responsibilities:  

i. Ensure all applicable laws and regulations are followed in the operation.  
ii. Centralize the purchasing of company software to ensure all applications conform to the regulations and company software standards.  
iii. Ensure all such software must be used in compliance with applicable licenses, notices, contracts, and agreements.
iv. Whenever possible, elect electronic tracking system that allows the use of standard hardware and that provide sufficient back-up capabilities.

Step 7) While Dispensary is active:

i. Minimize door opening to reduce possible contamination.

ii. Keep area tidy, swept, and uncluttered – ensure waste materials are immediately disposed of according to WASTE DISPOSAL.

iii. When handling medical marijuana, use new gloves.

iv. Tools and other equipment and surfaces should be lightly cleaned with 91% isopropyl alcohol daily or as necessary according to the Cleaning, Sanitation and Hygiene.

v. Maintain climate control system to mitigate airborne contamination.

vi. Use sanitary handling procedures in accordance with the requirements listed in procedure for PRODUCT HANDLING AND STORAGE.

vii. Store packaging materials and medical marijuana appropriately to prevent contamination and adulteration.

viii. Prevent cross-contamination and mix-ups between contaminated and unadulterated medical marijuana.

ix. All cannabis and cannabis product waste from dispensary operations must be disposed of in accordance with the procedures for WASTE DISPOSAL.

Health and Safety Considerations:

- All work areas, contact surfaces, utensils and tools must be cleaned and sanitized prior to use according to the requirements listed in the procedure for Cleaning, Sanitation and Hygiene.

- All product handling and storage must be done in accordance with the requirements listed in procedure for PRODUCT HANDLING AND STORAGE.

- All employees are required to properly display a valid employee occupational license or registration card at all times while on the licensed premises of the dispensary facility.

Records and Forms:

- Business Records

Competency and Responsibility:

- Employee experience and training required:
  - Trained on the Dispensary – Recordkeeping SOP and related equipment.
  - Clearance to work in the Dispensary.

- Employee with supervisory responsibility for this Standard Operating Procedure:
  - Dispensary Manager.
REFUSAL OF SALE AND RECOGNIZING SIGNS OF ABUSE

Disclaimer: Information presented in the sop is intended to be used by those skilled in the art, and is subject to change. It will require updates, as methodologies evolve, equipment specifications are determined, internal quality control protocols develop, local and state regulations are identified, and facility layouts are defined.

Background: This document is to ensuring employees are familiar with the signs of medical marijuana abuse and appropriate reasons and protocols for refusing a sale.

Purpose: To provide step-by-step instructions for the company’s protocols for the refusal of sale to a patient or caregiver.

Scope: This document is designed to provide a formal outline of the procedures all dispensary personnel shall follow to ensure compliance with the company policy and regulatory agency regulations.

Related Standards and Procedures:

- Cleaning, Sanitation and Hygiene
- PRODUCT HANDLING AND STORAGE
- PURCHASE RESTRICTIONS
- WASTE DISPOSAL

Definitions:

“Abuse” means the misuse, overconsumption or repeated attempts to acquire more medical marijuana than what is recommended by a patient and/or caregiver within any 30-day period.

Procedure:

Step 1) The company will enact methods for the refusal of sale and recognizing signs of abuse according to the procedures described herein.

Step 2) Recognize the Signs of Medicine Abuse or Instability in the Medical Use of Marijuana:

i. According to the Diagnostic and Statistical Manual for Mental Disorders, 4th edition (DSM-IV), substance abuse refers to an unhealthy pattern of substance use resulting in significant problems in one or more of the following ways:
Step 3) Employee Discretion:
   i. Recognizing medicine abuse in customers may be difficult;
   ii. Be cognizant of behaviors that may demonstrate abuse or instability. Such behaviors may be exhibited by, but are not limited to:
       a. An unkempt appearance or lack of personal hygiene,
       b. Child neglect,
       c. Restlessness,
       d. Paranoid thinking,
       e. Poor memory, or
       f. Difficulty concentrating.
   iii. Do keep in mind, any of these behaviors may be related to the mental or physical health of a patient, or a symptom of an illness;
   iv. If you suspect a patient or caregiver is abusing cannabis or if an employee reports suspicion, notate it in the patient’s or caregiver’s record;
   v. If a customer is clearly intoxicated (in a state of diminished physical and/or mental control), the company reserves the right to refuse service;
   vi. Ultimately, an employee must use his or her best judgment when deciding to refuse a sale and may do so without fear of reprisal from management; and
   vii. If a sale is refused, record the incident in patient record following the protocols outlined in Step 4) Refusal of Sale.

Step 4) Refusal of Sale:
   i. Any employee may refuse to dispense products to any customer whom would exceed the allowable limit;
   ii. If an employee believes the customer or the general public would be placed at risk, he/she should refuse the sale without fear of management retribution;
   iii. To a customer whom the employee suspects may be diverting product and must notify the Dispensary Manager immediately; and
   iv. If a patient or caregiver, each time they request and do not obtain products from the company.
a. Employee must record in the patient record the:
   1. Date,
   2. Name and registry cardholder’s number, and
   3. Reason the products were not provided.

Step 5) While Dispensary is active:
   i. Minimize door opening to reduce possible contamination.
   ii. Keep area tidy, swept, and uncluttered – ensure waste materials are immediately disposed of according to WASTE DISPOSAL.
   iii. When handling medical marijuana, use new gloves.
   iv. Tools and other equipment and surfaces should be lightly cleaned with 91% isopropyl alcohol daily or as necessary according to the Cleaning, Sanitation and Hygiene.
   v. Maintain climate control system to mitigate airborne contamination.
   vi. Use sanitary handling procedures in accordance with the requirements listed in procedure for PRODUCT HANDLING AND STORAGE.
   vii. Store packaging materials and medical marijuana appropriately to prevent contamination and adulteration.
   viii. Prevent cross-contamination and mix-ups between contaminated and unadulterated medical marijuana.
   ix. All cannabis and cannabis product waste from dispensary operations must be disposed of in accordance with the procedures for WASTE DISPOSAL.

Health and Safety Considerations:

- All work areas, contact surfaces, utensils and tools must be cleaned and sanitized prior to use according to the requirements listed in the procedure for Cleaning, Sanitation and Hygiene.
- All product handling and storage must be done in accordance with the requirements listed in procedure for PRODUCT HANDLING AND STORAGE.
- All employees are required to properly display a valid employee occupational license or registration card at all times while on the licensed premises of the dispensary facility.

Records and Forms:

- Diagnostic and Statistical Manual for Mental Disorders, 4th edition (DSM-IV)

Competency and Responsibility:

- Employee experience and training required:
  o Trained on the Dispensary – Refusal of Sale and Recognizing Signs of Abuse SOP and related equipment.
  o Clearance to work in the Dispensary.
- Employee with supervisory responsibility for this Standard Operating Procedure:
  o Dispensary Manager.
STAFFING AND TRAINING

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Background: To operate successfully the company must staff and train employees to work in the dispensary.

Purpose: To provide step-by-step instructions for the company’s protocols for the staffing and training of dispensary employees.

Scope: This document is designed to provide a formal outline of the procedures all dispensary personnel shall follow to ensure compliance with the company policy and regulatory agency regulations.

Related Standards and Procedures:

- Cleaning, Sanitation and Hygiene
- PRODUCT HANDLING AND STORAGE
- RECEIPT AND ACKNOWLEDGEMENT
- WASTE DISPOSAL

Definitions:

N/A

Procedure:

Step 1) The company will enact methods for the staffing and training of dispensary employees according to the procedures described herein.

Step 2) Staffing:

i. The Dispensary Manager shall hire the necessary staff to ensure the dispensing of cannabis is performed in accordance with regulatory agency regulations.

ii. Staffing estimates will be updated regularly.
Step 3) Employee Training Required:
   i. The Dispensary Manager must complete or assign completion of a Daily Walk-Through Log to ensure compliance with training policies and regulatory agency regulations.
   ii. All employees will receive an Employee Manual prior to employment. This employee manual provides in-depth training of company policies and procedures.
   iii. All employees will receive the appropriate Standard Operating Procedures for their assigned responsibilities.
   iv. Each employee must receive, read, and acknowledge their understanding of the material covered in the employee manual and Standard Operating Procedures.
   v. All employees must be trained by the Dispensary Manager and continually demonstrate a working knowledge of training materials as a condition of employment.
   vi. All changes to the dispensary Standard Operating Procedures shall be communicated to all dispensary employees and an acknowledgement of understanding must be documented for each employee.
   vii. All employees receive professional and appropriate training on compliance with state law, the therapeutic use of medical marijuana, safety, security, incident management, diversion and theft prevention.
   viii. No employee may work onsite prior to receiving orientation training or when any required critical training is eight (8) weeks or more past due.
   ix. All employees will receive training on the dispensary methods and products employed by the company.

Step 4) Prior to Working the Facility, Employees Shall Receive Full Training on:
   i. The methods of dispensing used;
   ii. The electronic tracking system used;
   iii. All remaining areas of the dispensary operations; and
   iv. The safe handling of medical marijuana.

Step 5) While Dispensary is active:
   i. Minimize door opening to reduce possible contamination.
   ii. Keep area tidy, swept, and uncluttered – ensure waste materials are immediately disposed of according to WASTE DISPOSAL.
   iii. When handling medical marijuana, use new gloves.
   iv. Tools and other equipment and surfaces should be lightly cleaned with 91% isopropyl alcohol daily or as necessary according to the Cleaning, Sanitation and Hygiene.
   v. Maintain climate control system to mitigate airborne contamination.
   vi. Use sanitary handling procedures in accordance with the requirements listed in procedure for PRODUCT HANDLING AND STORAGE.
   vii. Store packaging materials and medical marijuana appropriately to prevent contamination and adulteration.
   viii. Prevent cross-contamination and mix-ups between contaminated and unadulterated medical marijuana.
ix. All cannabis and cannabis product waste from dispensary operations must be disposed of in accordance with the procedures for WASTE DISPOSAL.

Health and Safety Considerations:

- All dispensary employees will receive proper training prior to employment to ensure efficient and compliant procedures are upheld to the company’s standards
- All employees are required to properly display a valid employee occupational license or registration card at all times while on the licensed premises of the dispensary facility.

Records and Forms:

- Daily Walk-Through Log
- Employee Manual
- Standard Operating Procedures

Competency and Responsibility:

- Employee experience and training required:
  - Trained on the Dispensary – Staffing and Training SOP and related equipment.
  - Clearance to work in the Dispensary.
- Employee with supervisory responsibility for this Standard Operating Procedure:
  - Dispensary Manager.
DOH REDACTED
**UPDATING PATIENT INFORMATION**

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**Background:** From time to time a patient and/or caregiver’s information will change. The company will make sure to accommodate any customer whose personal information has changed.

**Purpose:** To provide step-by-step instructions for the company’s protocols for updating patient and/or caregiver information.

**Scope:** This document is designed to provide a formal outline of the procedures all dispensary personnel shall follow to ensure compliance with the company policy and regulatory agency regulations.

**Related Standards and Procedures:**

- Cleaning, Sanitation and Hygiene
- PRODUCT HANDLING AND STORAGE
- Returning Patient Checklist
- WASTE DISPOSAL

**Definitions:**

N/A

**Procedure:**

Step 1) The company will enact methods for updating patient and/or caregiver information at the dispensary according to the procedures described herein.

Step 2) If the patient provides a new Medical Marijuana Registration (MMR), show the Dispensary Manager the new MMR with the patient’s ID for verification.

Step 3) Download the files that need to be updated which includes, but not limited to:

i. Driver’s license;
ii. MMR;
iii. Physician’s recommendation; and
iv. Other required documentation.

Step 4) Scan in new documents, label and save accordingly in the front desk computer.

Step 5) Update records in the patient profile (ID/MMR #s and expiration dates).

Step 6) Check-in patient in accordance with the Returning Patient Checklist procedure.

Step 7) Return the patient’s documentation and then combine and remove old patient records, as needed.

Step 8) While Dispensary is active:
   i. Minimize door opening to reduce possible contamination.
   ii. Keep area tidy, swept, and uncluttered – ensure waste materials are immediately disposed of according to WASTE DISPOSAL.
   iii. When handling medical marijuana, use new gloves.
   iv. Tools and other equipment and surfaces should be lightly cleaned with 91% isopropyl alcohol daily or as necessary according to the Cleaning, Sanitation and Hygiene.
   v. Maintain climate control system to mitigate airborne contamination.
   vi. Use sanitary handling procedures in accordance with the requirements listed in procedure for PRODUCT HANDLING AND STORAGE.
   vii. Store packaging materials and medical marijuana appropriately to prevent contamination and adulteration.
   viii. Prevent cross-contamination and mix-ups between contaminated and unadulterated medical marijuana.
   ix. All cannabis and cannabis product waste from dispensary operations must be disposed of in accordance with the procedures for WASTE DISPOSAL.

Health and Safety Considerations:

- All dispensary employees will receive proper training prior to employment to ensure efficient and compliant procedures are upheld to the company’s standards
- All employees are required to properly display a valid employee occupational license or registration card at all times while on the licensed premises of the dispensary facility.

Records and Forms:

- N/A

Competency and Responsibility:

- Employee experience and training required:
- Trained on the Dispensary – Updating Patient Information SOP and related equipment.
- Clearance to work in the Dispensary.

- Employee with supervisory responsibility for this Standard Operating Procedure:
  - Dispensary Manager.
**VISITOR POLICY**

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<td>Revision No.</td>
<td>0</td>
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<td>Original Date of Issue</td>
<td>03-20-2017</td>
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<td>Revision Date</td>
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**Disclaimer:** Information presented in the sop is intended to be used by those skilled in the art, and is subject to change. It will require updates, as methodologies evolve, equipment specifications are determined, internal quality control protocols develop, local and state regulations are identified, and facility layouts are defined.

**Background:** As a flagship dispensary, the company expects to have visitors at its facility.

**Purpose:** To provide step-by-step instructions for establishing the company’s visitor policy.

**Scope:** This document is designed to provide a formal outline of the procedures all dispensary personnel shall follow to ensure compliance with the company policy and regulatory agency regulations.

**Related Standards and Procedures:**
- Cleaning, Sanitation and Hygiene
- PRODUCT HANDLING AND STORAGE
- RECORDKEEPING
- WASTE DISPOSAL

**Definitions:**

N/A

**Procedure:**

Step 1) The company will enact a visitors policy according to the procedures described herein.

Step 2) Security Associate Responsibility:
  i. When visitors arrive at the facility, verify the visitor is expected and has the appropriate approval.
  ii. Ask the visitor(s) to provide a valid photo ID and scan it. Regulatory agency representatives and law enforcement officers should be asked to show an official identification card and/or badge.
  iii. Verify the visitor is over 18 years of age and that their ID is not expired.
iv. Use the **State and Country Photo ID Verification Booklet** to verify the authenticity of the visitor’s ID card.

v. Enter scanned IDs into electronic tracking system.

vi. Photocopy the visitor’s valid driver's license or identification badge.

vii. Enter the relevant information into the **Visitor Log**.

viii. Issue the visitor a laminated visitor badge and ask him/her to wear the badge around his/her neck in a manner that ensures the badge is visible at all times (i.e. cannot be in shirt pocket or under shirt or under a jacket).

ix. Explain the badge is property of the company and must be returned before leaving.

x. If the visitor requires access to areas where security equipment, cash, or medical marijuana are stored they must be continuously escorted.

xi. In the event prior approval is impractical due to unforeseen circumstances, you must attach a report to the **Visitor Log** indicating the following:

   a. Name of the visitor,
   b. Date,
   c. Time,
   d. Purpose of the visit, and
   e. Facts upon which access was granted.

xii. Ensure and validate the visitor filled in the following information in the **Visitor Log**:

   a. Date;
   b. Visitor Badge #;
   c. Visitor Name;
   d. Visitor Signature;
   e. Reason for Visit;
   f. Time in, and upon leaving the facility;
   g. Time departed facility; and
   h. Any additional information required by the regulatory agency regulations.

**Step 3) Employee Responsibility:**

i. Must continuously escort the visitor while in the licensed premises.

ii. Ensure the visitor only has access permissions for public areas such as waiting rooms, bathrooms, and break rooms.

iii. The visitor must scan their badge at all access points to record movement within the facility, however the escorting dispensary employee will need to unlock all limited or restricted access areas for the visitor.

iv. Immediately report suspicious behavior by visitors or any deviation from these procedures to the Security Associate or Dispensary Manager.

**Step 4) Visitors are not to be admitted to enter the facility, except as absolutely required for business functions.**

**Step 5) Unannounced visitors will not be allowed to enter the facility.**
Step 6) All authorized visitors must be documented on the **Visitor Log** and continuously escorted by a dispensary employee with a valid employee occupational license or registration card.

Step 7) Only dispensary employees of the company, regulatory agency representatives, law enforcement, other officials acting in the course of their duties, outside vendors, contractors, and authorized visitors may access the dispensary facility.

Step 8) Any unauthorized person must be denied access to the facility, and staff may contact law enforcement as necessary to remove unauthorized individuals from the licensed premises. The Dispensary Manager must be notified immediately.

Step 9) Aside from regulatory agency representatives and law enforcement officers, the dispensary facility will not accept unannounced visitors.

Step 10) The only persons who may be on the company’s licensed premises include:

i. A dispensary employee;

ii. A patient who holds a valid Medical Marijuana Registration (MMR) card;

iii. The caregiver of a patient who holds a valid MMR card;

iv. A regulatory agency representative and/or law enforcement officers inspecting the dispensary pursuant to regulatory agency regulations;

v. Other officials acting in the course of their duties;

vi. Outside vendors;

vii. Contractors;

viii. Authorized visitors; and/or

ix. All other authorized visitors not identified above must follow the **Visitor Policy** procedure.

Step 11) While Dispensary is active:

i. Minimize door opening to reduce possible contamination.

ii. Keep area tidy, swept, and uncluttered – ensure waste materials are immediately disposed of according to **WASTE DISPOSAL**.

iii. When handling medical marijuana, use new gloves.

iv. Tools and other equipment and surfaces should be lightly cleaned with 91% isopropyl alcohol daily or as necessary according to the **Cleaning, Sanitation and Hygiene**.

v. Maintain climate control system to mitigate airborne contamination.

vi. Use sanitary handling procedures in accordance with the requirements listed in procedure for **PRODUCT HANDLING AND STORAGE**.

vii. Store packaging materials and medical marijuana appropriately to prevent contamination and adulteration.

viii. Prevent cross-contamination and mix-ups between contaminated and unadulterated medical marijuana.
ix. All cannabis and cannabis product waste from dispensary operations must be disposed of in accordance with the procedures for WASTE DISPOSAL.

Health and Safety Considerations:

- All dispensary employees will receive proper training prior to employment to ensure efficient and compliant procedures are upheld to the company’s standards.
- All employees must maintain a sharp awareness when entering and leaving the dispensary facility and avoid arriving or leaving alone whenever possible.
- All employees are required to properly display a valid employee occupational license or registration card at all times while on the licensed premises of the dispensary facility.
- Employees are equipped with a panic button lanyard or can easily access a stationary panic button in the work area(s).
- All records must be maintained in accordance with the procedure for RECORDKEEPING.

Records and Forms:

- State and Country Verification Booklet
- Visitor Log

Competency and Responsibility:

- Employee experience and training required:
  - Trained on the Dispensary – Visitor Policy SOP and related equipment.
  - Clearance to work in the Dispensary.
- Employee with supervisory responsibility for this Standard Operating Procedure:
  - Dispensary Manager.
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<tr>
<td><strong>First Name:</strong> Susan</td>
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<tr>
<td><strong>Occupation:</strong> Executive Director and CEO</td>
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<td><strong>Also known as:</strong> Elder1</td>
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<tr>
<td><strong>First Name:</strong> Kathryn</td>
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<tr>
<td><strong>Occupation:</strong> COO and Director</td>
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<tr>
<td><strong>Occupation:</strong> Real Estate Developer and Urban Planner</td>
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<td><strong>First Name:</strong> John</td>
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<tr>
<td><strong>Occupation:</strong> Neurosurgeon and Senior Advisor</td>
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<tr>
<td><strong>Also known as:</strong> The Entrust Group Inc. fbo John William Bookwalter, III</td>
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<td><strong>First Name:</strong> Ronald</td>
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<tr>
<td><strong>Occupation:</strong> Founder and Vice President</td>
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<td><strong>First Name</strong>: Juan</td>
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<tr>
<td><strong>Occupation</strong>: Executive Director and Accountant</td>
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<td><strong>First Name</strong>: Brooke</td>
<td><strong>Middle Name</strong>: Ellen</td>
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<td><strong>Occupation</strong>: Director of Compliance and Chief Executive Officer</td>
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<td><strong>First Name</strong>: Deborah</td>
<td><strong>Middle Name</strong>: W</td>
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<tr>
<td><strong>Occupation</strong>: B.A., M.H.A. – President and Chief Executive Officer</td>
<td><strong>Title in the applicant’s business</strong>: Board Director</td>
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<td><strong>Middle Name</strong>: Mara</td>
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<td><strong>Occupation</strong>: Pharm D and Manager</td>
<td><strong>Title in the applicant’s business</strong>: General Manager / Head Pharmacist</td>
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<tr>
<td><strong>Occupation</strong>: Cannabis Scientist and Co-Founder</td>
<td><strong>Title in the applicant’s business</strong>: Chief Science Officer</td>
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<td><strong>Occupation</strong>: Health Care Regulatory and Policy Attorney</td>
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<tr>
<td><strong>Last Name:</strong> Murray</td>
<td><strong>Suffix:</strong> III</td>
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<td><strong>Occupation:</strong> Investment Banker and Managing Partner</td>
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<td><strong>First Name:</strong> Heather</td>
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<tr>
<td><strong>Last Name:</strong> Shuker</td>
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<tr>
<td><strong>Occupation:</strong> Managing Director and Business Owner</td>
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<td><strong>First Name:</strong> George</td>
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<td><strong>Last Name:</strong> Verden</td>
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<tr>
<td><strong>Occupation:</strong> Owner and Chief Executive Officer of a Strategic Security Consulting Firm / Special Agent</td>
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<td><strong>First Name:</strong> Debra</td>
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<td><strong>Last Name:</strong> Matonak</td>
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<td><strong>Occupation:</strong> Owner of USDA Inspected Meat Processing Establishment</td>
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<td><strong>First Name:</strong> James</td>
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<td><strong>Last Name:</strong> Perko</td>
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<td><strong>Occupation:</strong> Owner of USDA Inspected Meat Processing Establishment</td>
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In 2014, Keystone Integrated Care took an 11-year-old girl with severe intractable epilepsy named Hannah and made it their mission to get medicine to patients in the Commonwealth of Pennsylvania that didn’t have access to medical cannabis.

After creating the "Medical Cannabis in PA" Brigade for the 2015 Harrisburg Farm Show, we understood that there was a significant gap in information and educational resources in Pennsylvania.

In early 2015 our members founded the Pennsylvania Medical Cannabis Society (PAMCS) and set out with the mission to foster a model medical cannabis industry through education and leadership.

Over the last two years, the Keystone Integrated Care team has been involved in over 15 educational events across the state with 700+ attendees.

GOALS
PAMCS consists of medical cannabis industry professionals working together to:

- Represent the PA medical cannabis industry in public venues including the government, private-sector, and the media.
- Provide members with timely information, expert services, and professional support on medical cannabis issues.
- Advance medical cannabis policy, science, education, and ethics.

RESPONSIBILITIES
- Provide education to the public, our members, and our leaders.
- Advocate and raise public awareness as to the benefits of medical cannabis and practical legislation.
- Lobby for best interest of PA patients and residents.

VISION
A diverse and sustainable medical cannabis industry in Pennsylvania, known for its exemplary standards, extraordinary products, and compassionate practice.
The Team Behind KIC

Keystone Integrated Care (KIC) is a development stage company seeking to secure multiple medical marijuana permits in the Commonwealth of Pennsylvania.

KIC is applying to secure a Grower/Processor permit in conjunction with a Dispensary permit. Meeting these criteria will allow for KIC to operate up to three medical dispensary locations within Region 5 (the "Southwest Region").

Keystone Integrated Care is committed to advancing health through medical cannabis therapies, matching the medical conditions of approved patients with solutions permitted within the Commonwealth of Pennsylvania.

Brooke Gehring

Brooke Gehring is recognized as one of Colorado’s most successful female entrepreneurs in the medical marijuana industry. Brooke founded Live Green Consulting in Denver, Colorado and later became involved in the medical marijuana industry in 2009. She is the Managing Partner and Chief of Executive Officer of Patients Choice of Colorado and Live Green Cannabis, an industry leading legal medical and recreational marijuana company with four locations across the Front Range of Colorado and two large-scale cultivation operations that employ upwards of 150 state licensed employees.

Currently, Brooke is the Chair of the Executive Board of the Marijuana Industry Group (MIG), as well as a Sustaining Member of the National Cannabis Industry Association (NCIA). Most recently, Brooke has been selected to be a Founding Board Member of the Council for Responsible Cannabis Regulation (CRCR) and a Founding Member of Women Grow.

Since 2010, Brooke has been proactive in the legislative, rule making, and licensing processes that have created regulatory frameworks in both the staff and local levels. Brooke most recently served on the Colorado State Licensing Authority’s Asst Working Groups several times as member and stakeholder for the Production Management, Licensing, Licensed Premises, Transportation and Storage, Taxation, as well as the Testing and Random Sampling work group. Ms. Gehring is actively involved in promoting 280e tax reform and banking solutions that will help to shape the future of this industry.

Thomas Perko

Thomas J. Perko is President and Co-founder of the Pennsylvania Medical Cannabis Society (PAMCS), the largest professional trade organization for the emerging medical cannabis industry in the Commonwealth of Pennsylvania, as well as Founder of Keystone Integrated Care and several other businesses. He has more than 10 years of experience working with the private sector and on government contracts with the Department of Defense on projects totaling more than $90 million dollars.

Tom has performed extensive research and analysis on the overall programmatic success or failure of medical cannabis programs in States where the use of medical cannabis has been legalized. For several years, he has applied these skills towards understanding the current climate of medical cannabis and carefully analyzed medical cannabis programs throughout the United States. He has been able to utilize this information to make recommendations to members of the medical marijuana working group in Harrisburg to assist with developing the language for the Rules BILL.

His vision for PAMCS is to create strategic alliances with the hundreds of businesses entering the emerging medical cannabis industry to leverage the power in numbers to advance medical cannabis reform in the Commonwealth of Pennsylvania.

Heather Shuker

Heather Shuker became involved with the medical cannabis advocacy movement in 2013 and helped establish Campaign for Compassion, an organization of parents dedicated to advocate and to educate the public as well as the general assembly concerning the positive effects of the often misunderstood realm of cannabis treatment.

Heather’s involvement and dedication to this movement started when her thirteen year old daughter, Hannah, who suffers from severe intractable epilepsy was told she was out of viable medical treatment options. Hannah and Heather’s journey have been shared throughout the world through social media outlets, local news broadcasts and Chronicles, National media outlets and the USA Today. Heather is committed to educating individuals and medical professionals on the benefits of medical cannabis as the medical cannabis industry evolves in Pennsylvania as one of the most successful programs in the United States. Since the enactment of Act 16, the Medical Marijuana Act, Shuker has acted as the Managing Director of the Pennsylvania Medical Cannabis Society.

Furthermore, Heather served as the Pittsburgh, Pennsylvania patient representative for the United Mitochondrial Disease Foundation (UMDF). She has also held several successful fundraising events for the UMDF.
Keystone Integrated Care

Thomas J. Perko is president of the Pennsylvania Medical Cannabis Society, professional trade organization for the emerging medical cannabis industry in Pennsylvania, as well as co-owner of Keystone Organic Farms and several other cannabis companies. With 10 years of experience working with the private sector and on government projects, Mr. Perko has utilized this information to make recommendations to members of the House and Senate to assist in the development of language for the House and Senate committees on marijuana reform.

Cannabis as Medicine

Keystone Integrated Care began educating in January 2015, when the patients needed help the most.
In late 2014, with the intent to make this medicine available to Pennsylvania Patients, Keystone Integrated Care set out to educate and influence best practice throughout the state.

Formed PAMCS in May 2015
a nonprofit trade organization with mission to educate and influence the state.

60+ Hours of Inbound Phone Calls
working to inform and educate potential Patients, Medical Professionals, Legislators, Workforce Members, Business Professionals, and Advocates.

35+ Educational Events
across the state of PA over 2 years.

Getting the message out in
Over 30 Press Appearances
The KIC team formed PAMCS and set out to inform, educate, and develop a new industry, holding events in major cities across the state.
What PAMCS Is Doing

PAMCS provides a variety of services to the Commonwealth.

Industry Events
These informative educational events are held across the state to provide Pennsylvania Residents with valuable professional development and training. Cannabis experts share their success stories and help to educate others. Topics may include medical education, community outreach, public relations, law enforcement, application development and more. Guest speakers to include industry pros, local experts, start-up professionals, legal and medical experts.

Annual Conference
Agendas for the conference include training sessions, professional skill development, case studies and workshops on a variety of topics related to our mission, as well as national trends and issues.

Informational Email and Mailings
PAMCS provides a monthly e-mail newsletter to keep members up-to-date on possible funding opportunities, organizational and program news and upcoming events and training as well as program specific ideas ranging from community involvement, social responsibility, educational resources, and state or national initiatives in medical cannabis.

Regional Chapter Coverage
PAMCS currently has chapters in Pittsburgh, Philadelphia and Harrisburg.

“After seeing what this does for these families - there isn’t a better feeling in the world than to put your head down and fight for change... and the fastest way to influence that change is through education.”

Thomas Perko
Founder
Pennsylvania Medical Cannabis Society & Keystone Integrated Care
The Team We’ve Built

Chief Executive Officer
Brooke Gehring
Brooke is recognized as one of Colorado’s most successful female entrepreneurs in the medical marijuana industry. Her success has been cited and covered in major media outlets including but not limited to: Time Magazine, Bloomberg/Business Week, The New York Times, MSN Money, Entrepreneur Magazine, People Magazine, CNBC, ABC, CNN and many local media outlets. Brooke’s company ranked as 25 on the 2015 CRE 100 FFRS list, with more than $91 million in revenue. Her company has four locations across Colorado and two large-scale cultivation operations that employ at least 85 state-licensed employees.

Chief Financial Officer
Tripp Murray III
Mr. Murray has over three years of direct cannabis experience assisting companies with raising capital; for both applications and working capital, improving operational efficiencies, decrease cost of manufacturing along with increasing sales and margins. Mr. Murray has worked as CFO for Revolution Enterprises, Illinois largest medical cannabis cultivator and Vermont’s largest dispensary, Champlain Valley Dispensary.

Chief Compliance Officer
Robert Morgan
As the first statewide project coordinator for the State of Illinois Medical Cannabis Pilot Program, Mr. Morgan was appointed by the Governor of Illinois to develop and implement a regulatory framework for the use of cannabis by eligible patients. Mr. Morgan oversaw the efforts of five state agencies and more than 50 employees charged with creating program rules and fees, laboratory testing and database systems, and a selection process for licensed dispensary facilities and cultivation centers.

Director of Diversion
G. Michael Verden
Former 23-year Secret Service Special Agent in Charge, Mr. Verden provided protection of the President, First Lady and their immediate family. Former Director of Security for the NBA. Mr. Verden wrote security plan for the Super Bowl, Kentucky Derby, Women’s World Cup, G-8 Summit, United Nations General Assembly as well as the Democratic and Republican National Convention. Mr. Verden wrote the security plans for 3 winning applicants in Illinois Medical Marijuana Program.

Chief Science Officer
Darwin E. Millard, ME, Ex.E
Mr. Millard brings 30-years of hands on experience manufacturing cannabinoid extracts and products from Cannabis on the commercial scale to the Keystone team. Former Co-Head of Science at Dodi Elikis and Botanicals. He was integral to the development of the first hemp-based cannabinoid dietary supplements to be sold in the U.S. Mr. Millard has a degree in Mechanical Engineering and specializes in extraction methodologies as well as in designing and implementing quality control procedures and protocols for Cannabis products’ manufacturers to stay compliant.

Chief Retail Officer
Molly Blasier
Ms. Blasier’s 25-year career in real estate development has spanned a full range of real estate development experience including site acquisition, master planning, feasibility analysis, architectural design, marketing and brokerage. Molly is the originating developer and partner of EastSide, a 120,000 sf retail center in Pittsburgh, PA. Anchored by the regions first Whole Foods Market, EastSide uniquely transformed this entire inner city neighborhood into one of Pittsburgh’s most vibrant revitalization successes.

Quality Control Manager
Ronald Fazio
Ron Fazio is a forensic professional with over 20 years of controlled substance experience. Ron has managed numerous accredited forensic labs, multi-discipline labs, and multi-site crime labs for the past ten years. Through public-private partnerships, Ron has overseen the installation of 5 new crime labs in law enforcement facilities, bringing fast and local controlled substance testing to solve backlogs and turn-around time issues. Besides having significant multi-site operational leadership experience, Ron is well-versed in controlled substance diversion control and physical security.

Director of Channel Sales
Kathryn Battista
Katie Battista’s accomplishments as a healthcare business development professional include successfully leveraging policy issues to gain contracts with all of PHS designated managed care organizations and surpassing every campaign goal in 12 years as a fundraiser for prestigious institutions. Katie currently serves as Chief Operating Officer for Turman’s Medical Supplies focusing on growth through strategic contracting and oversight of operations.
Medical Advisory Board

Ryan Vandrey, Ph.D.
Currently a professor at Johns Hopkins University School of Medicine, Dr. Vandrey has 17 years of experience in cannabis research and teaches courses on cannabis pharmacology. His studies have covered cannabis formulation pharmacokinetics and dynamics, products testing, cannabinoids for sleep disorders as well as cannabis withdrawal and dependence.

James Bradley, M.D.
Dr. Bradley is a Board Certified Orthopedic Surgeon. As the current doctor of the Pittsburgh Steelers, he specializes in sports medicine and reconstructive surgery and is a Clinical Professor with University of Pittsburgh Medical Center Health System, Department of Orthopedic surgery and is a past president of the National Football League Physicians Society.

William J. Bookwalter III, M.D.
Dr. Bookwalter is currently a neurosurgeon in private practice with Greater Pittsburgh Orthopedic Associates. He has been practicing neurosurgery for over thirty years and was on the faculty of the Department of Neurosurgery at the University of Pittsburgh Medical Center.

Michael Cleary Ed.D., CHES, M.S.
A Certified Health Education Specialist, Dr. Cleary received his bachelor’s and master’s degrees in health and safety at Indiana University Bloomington and a doctorate in education from Ball State University. Presently, he is a doctor and professor of public health at Slippery Rock University where he is a department chair and teaches courses in program planning and health and behavior theory.

Joseph F. Robare, DrPH, MS, RD, LDN
Dr. Robare is the Graduate Coordinator and Master of Public Health and Master of Public Health program in the College of Health, Environment and Science. Dr. Robare is an advocate of scientifically based methods for disease prevention, public health promotion and public policy change.
Board of Directors

Debbie Linhart
Deborah Linhart, a former top executive at Allegheny Health Network and Magee-Womens Hospital of UPMC, is currently the chief executive officer of Bethelham Haven, an Uptown-based women's shelter. Ms. Linhart was formerly vice president of Women’s Health Initiatives at AHN where she oversaw development of a maternity center at Jefferson Hospital and the Comprehensive Women's Center at Westford Health & Wellness Pavilion. Her prior positions also include president and chief executive of Magee-Womens Research Institute and Foundation, interim chief executive of Magee-Womens Hospital of UPMC and vice president of ambulatory and strategic development at Magee.

Ronald Fazio
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Daniel Stokes
Mr. Stokes has over 40 years of entrepreneurial and senior management experience focusing on management of health organizations. Mr. Stokes is a licensed Certified Public Accountant and has over 30 years experience in providing a wide variety of financial services to healthcare, not-for-profit and other clients. His experience includes traditional accounting and auditing services as well as financial feasibility studies, capital financing, third-party reimbursement, development process services, merger and acquisition, strategic planning and operational reviews. His industry knowledge includes all facets of the health care industry including nursing homes, assisted living facilities, home health agencies, and continuing care.

Juan Garrett
Mr. Garrett is the Executive Director of the Riverside Center for Innovation, an economic development corporation located in the city of Pittsburgh. Juan has developed many of the RCI programs including the Diversity Business Resource Center, Southwestern PA Veterans Chamber of Commerce, New Business New Beginnings, and a 60,000 sq. ft. incubator created for minority and women-owned start-up businesses. He has received certifications from the National Development Corporation for economic development and is able to provide business credit, real estate financial analysis and loan packaging procedures that result in jobs and stabilizing deteriorating neighborhoods. Certified by the Pennsylvania Economic Development Institute enables Juan to provide state financing program to regional manufacturing firms. Juan has also been a certified Entrepreneurship Teacher from the National Foundation of Training Entrepreneurship. With this certification, he can teach low-income and at-risk young people the basics of starting and operating a small business.

Heather Shuker
Heather Shuker became involved with the medical cannabis advocacy movement in 2013 and helped establish the Campaign for Compassion, an organization of parents dedicated to advocate and to educate the public as well as the general assembly concerning the positive effects of cannabis treatment. Heather’s involvement and dedication to this movement started when her thirteen year old daughter, Hannah, who suffers from severe intractable epilepsy, was told she was out of viable medical treatment options. Hannah and Heather’s journey have been shared throughout the world through social media outlets, local news broadcasts and Chronicles, national media outlets and the USA Today. Since the enactment of Act 66, the Medical Marijuana Act, Shuker has acted as the Managing Director of the Pennsylvania Medical Cannabis Society. Heather served as the Pittsburgh, Pennsylvania patient representative for the United Mitochondrial Disease Foundation.