Medical Marijuana Grower/Processor Permit Application

You may apply for one grower/processor permit in this application for any of the medical marijuana regions listed below. A separate application must be submitted for each grower/processor permit sought by the applicant. Please see the Medical Marijuana Organization Permit Application Instructions for a table of the counties within each medical marijuana region.

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

☐ Northwest       ☐ Northcentral       ☒ Northeast
☐ Southwest       ☐ Southcentral       ☐ Southeast

County: Luzerne
Medical Marijuana Grower/Processor Permit Application

Part A - Applicant Identification and Facility 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 PERMIT.

Section 1 – Applicant Name, Address and Contact Information
Business or Individual Name and Principal Address
Business Name, as it appears on the applicant’s certificate of incorporation, charter, bylaws, partnership agreement or other legal business formation documents:

BrightStar BioMedics LLC

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

N/A

Business Address: 425 Spruce Street Ste.200

City: Scranton
State: PA
Zip Code: 18501

Phone:
Fax: N/A

☒ Primary Contact or ☐ Registered Agent for this Application

Name: Robert Vitale

Address:

City: Scranton
State: PA
Zip Code: 18501
Phone:
Fax: N/A

Section 2 – Facility Information

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 grower/processor permit application, and any proposed location for a grower/processor facility.

☒ Yes ☐ No
Medical Marijuana Grower/Processor Permit Application

PROPOSED GROWER/PROCESSOR FACILITY (PLEASE INDICATE THE FACILITY NAME AS YOU WOULD LIKE IT TO APPEAR ON THE PERMIT)

**Facility Name:** BrightStar Biomedics

**Facility Address:** 3680 Laurel Run Rd

**City:** Laurel Run  
**State:** PA  
**Zip Code:** 18706

**County:** Luzerne  
**Municipality:** Laurel Run

☐ Owned by the applicant  
☒ Leased by the applicant  
☐ Option for applicant to buy/lease

Is the facility located in a **financially distressed municipality**?

Yes  
No

Does the facility have an **excess maintenance agreement** or road use agreement with PennDOT, the local municipality, or the county?

Yes  
No

Part B – Diversity Plan

(Scoring Method: 100 Points)

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

Section 3 – Diversity Plan

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

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

| ☒ Yes | ☐ No |
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.

BrightStar’s Diversity Mission Statement

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

**BrightStar’s Definition of Diversity**

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

**BrightStar’s Diversity Goals**

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

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

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

**BrightStar’s Diversity Status**

For BrightStar, diversity is more than an ideal, concept, or talking point—it is endemic in the organization itself. BrightStar is owned and controlled by a majority of individuals who are women and is seeking certification as a woman-owned business enterprise. Five of BrightStar’s seven owners are women. One of the owners is LGBTQ. One is a six-year veteran of the United States Marine Corps. Additionally, included in BrightStar’s rank of six corporate Principals are an African American, an Asian American, a woman, and a Veteran. And finally, BrightStar’s nine-person management team boasts two women, a member of the Jewish faith, a Muslim, two veterans—one of whom is service disabled—and Hispanic and Asian individuals. BrightStar’s Owners, Principals, Advisory Board Members and Financial Backers hale from diverse geographic regions, have varied educational backgrounds, subscribe to varying religious beliefs and bring diverse perspectives to the management of the organization. Our organization celebrates diversity in every possible way.

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

<table>
<thead>
<tr>
<th>Category</th>
<th>Total</th>
<th>M</th>
<th>F</th>
<th>Vet.</th>
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<th>Black</th>
<th>Hisp</th>
<th>Asian</th>
<th>LGBTQ</th>
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<tr>
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<td>7</td>
<td></td>
<td>1</td>
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<td>1</td>
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<tr>
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<td>2</td>
<td>1</td>
<td>3</td>
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<td></td>
<td></td>
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<td>7</td>
<td></td>
<td></td>
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<td></td>
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</tr>
</tbody>
</table>

**BrightStar’s Equal Employment Opportunity and Affirmative Action Policies**

**Equal Employment Opportunity Policy**

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

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

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

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

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

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

Affirmative Action Program (AAP) – Women and Minorities

BrightStar has developed and will implement programs to ensure that no barriers to employment exist for women and minorities, and that female and minority applicants and employees enjoy equal employment opportunities within our organization. Those programs include, but are not limited to, the following:
Advertising open positions in minority news media and women’s interest media.
Including affirmative action/equal employment opportunity commitment in all advertisements.
Publishing information on open positions to organizations representing women and minorities.
Recruiting at educational institutions with predominately minority or female students.
Requesting that employment agencies refer female and minority candidates.
Ensuring the selection process is focused on job-related qualifications.
Training management personnel on proper interview and selection procedures.
Training all employees on BrightStar’s fair employment policies.
Conducting periodic reviews of job descriptions and hiring procedures to ensure they accurately reflect and embody BrightStar’s EEO and AA policies.

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

BrightStar’s objective is to maintain a thoroughly diverse workforce. BrightStar is committed to full realization of this objective through a continuous procedure of monitoring and reporting.

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

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

BrightStar is equally committed to taking affirmative action to employ, and to advance in employment, our nation’s protected veterans. BrightStar will utilize the same programs outlined above to specifically attract veterans for employment positions.
Publication of EEO and AA Policy Statements

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

Diversity Outreach

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

- Participation in recruitment programs specifically designed to reach diverse applicants, including the Professional Diversity Network’s Philadelphia Professional & Technology Diversity Career Fair, RecruitMilitary’s Philadelphia Veterans Job Fair, and Out & Equal’s Workplace Summit.
- Publishing job opportunities at non-profit and government agencies serving diverse populations, including local nonprofit workforce development agencies, healthcare agencies, and veteran-serving nonprofits.
- Publishing job opportunities to professional associations such as African American, Hispanic, and Asian Chambers of Commerce, the National Black MBA Association, Urban League, National Black Chamber of Commerce, and others.
- Recruiting at colleges and universities that serve large numbers of minorities and first-generation college students, including Cheyney University, Lincoln University, and Lackawanna College.
- Publishing job advertisements in newspapers, magazines and journals with minority readership.
- Publishing job advertisements on websites, webcasts, podcasts and other online channels serving diverse groups.
- Utilizing the recruitment solutions services of the regional Workforce Investment Board.

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

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

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

BrightStar will give preference to qualified businesses registered as state-approved vendors, and will require its contractors and vendors to comply with the equal employment opportunity laws and guidelines in their employment practices.

BrightStar has identified the following state-approved vendors as potential commercial partners:

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

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

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

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

4.) A+Plus Powerwash, Inc. (Vendor No. 200868)
   
   Taylor, PA 18517  
   Woman Business Enterprise  
   General Building and Office Cleaning and Maintenance Services Subcontractor
5.) Classic Spray (Vendor No. 332000)
   Scranton, PA 18510
   Minority Business Enterprise
   General Construction Services Subcontractor

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

7.) The Business Route, LLC (Vendor No. 509751)
   Philadelphia, PA 19107
   LGBT Business Enterprise
   Business and Corporate Management Consulting Subcontractor

8.) JPI Group (Vendor No. 511378)
   Philadelphia, PA 19103
   Minority Business Enterprise
   Personnel Recruiting Subcontractor

BrightStar anticipates that its contracts with diverse groups will be equal at least 30% of expected revenues. Moreover, whenever it is seeking services, BrightStar will always seek out diverse groups as a first option.

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

**BrightStar’s Diverse-Group Professional Development Plan**

At BrightStar, we believe that meaningful diversity within the organization requires that every employee be afforded opportunity for personal and professional growth. To this end, BrightStar is committed to providing employees with the resources, training, and support necessary to succeed. Specifically, we will undertake the following initiatives to ensure that our employees receive every opportunity to achieve personal growth, career satisfaction, and professional success:
Training: BrightStar views training and educational programs as a critical component of its diversity program. EEO training, diversity training, and educational programs will be required for all management and staff as part of onboarding, at the time of promotion, and at mandatory annual staff reengagement sessions. Training programs will include in-person and/or web-based modules, such as those developed by industry leaders like Korn Ferry and PRISM International, Inc. BrightStar will also incorporate educational videos concerning prevention of discrimination in the workplace prepared by the Pennsylvania Human Rights Commission (“PHRC”) to educate employees on their responsibilities and rights, including Introduction to PHRC, Employer Discrimination, Employee, Filing a Complaint, Education, and Disability Discrimination (found on the PHRC website); National Diversity Council webinars; and trainings available through the American Association for Access, Equity and Diversity Professional Development and Training Institute (found on its website).

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

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

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

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

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

Through these and other initiatives, BrightStar is committed to providing every employee a full...
Additional Diversity Initiatives

Creation of Executive-Level Role of Diversity and Inclusion Officer

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

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

Establishment of Employee Diversity Committee

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

- Make recommendations to promote diversity, inclusion, access, and opportunity.
- Advise the Chief Diversity Officer and Human Resources Director on the implementation of the various aspects of BrightStar’s diversity plan.
- Solicit the views of the BrightStar workforce on all aspect of diversity.
- Evaluate specific concerns pertaining to potential bias and/or intolerance in the workplace.
- Identify programs that will promote BrightStar’s diversity goals.
- Report annually to the Diversity and Inclusion Officer and Human Resources Director on BrightStar’s progress in achieving a more inclusive, nurturing and diverse
work environment.
Members of the EDC may be invited to represent BrightStar at professional events and external activities, including recruitment efforts and mentoring of persons outside the organization. BrightStar will provide the EDC with a budget and access to resources such as e-mail networks.

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

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

**Absolute Pay Equity**

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

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

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

**Implementation of Other Diversity Initiatives**

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

**Workforce Utilization Report**

Once BrightStar has achieved full operational capacity, its workforce will be the embodiment and culmination of the mission, goals, plans, policies, work-culture ideals, and rigorous oversight
set forth in this diversity plan. Indeed, BrightStar has every intention of becoming the paradigm in Northeastern Pennsylvania—and beyond—for workplace diversity, inclusion, access, and opportunity. BrightStar will do this by making every effort to achieve a workforce which is 90% diverse within three years of operation. (Significantly, this number—90%—is not arrived at arbitrarily. BrightStar’s CEO, Bob Vitale, currently serves as the CEO of a labor-management company which itself has achieved 90% diversity.)

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

<table>
<thead>
<tr>
<th>Job Category</th>
<th>Total</th>
<th>M</th>
<th>F</th>
<th>Vets</th>
<th>Service-Disabled Veterans</th>
<th>Black/AA</th>
<th>Hisp/Lat</th>
<th>Asian</th>
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</tr>
<tr>
<td>Admin. Support</td>
<td>5</td>
<td>1</td>
<td>4</td>
<td>1</td>
<td>1</td>
<td>1</td>
<td>1</td>
<td>1</td>
<td>1</td>
</tr>
<tr>
<td>Security</td>
<td>5</td>
<td>3</td>
<td>2</td>
<td>1</td>
<td>1</td>
<td>1</td>
<td>1</td>
<td>1</td>
<td>1</td>
</tr>
<tr>
<td>Skilled Labor</td>
<td>15</td>
<td>7</td>
<td>8</td>
<td>2</td>
<td>2</td>
<td>5</td>
<td>3</td>
<td>2</td>
<td>1</td>
</tr>
</tbody>
</table>

**Accountability**

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

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

- Maintain records documenting recruitment, retention, and promotion rates of diverse candidates and employees.
- Conduct periodic review of employment decisions to ensure compliance with company policies.
- Regular conferences with department heads and managers to identify potential problem areas.
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 Principals, Financial Backers and Operators

<table>
<thead>
<tr>
<th>Name and Residential Address</th>
<th>Name and Residential Address</th>
</tr>
</thead>
<tbody>
<tr>
<td>First Name: Robert</td>
<td>First Name: Ronald</td>
</tr>
<tr>
<td>Middle Name:</td>
<td>Middle Name: Anthony</td>
</tr>
<tr>
<td>Last Name: Vitale</td>
<td>Last Name: Furiato</td>
</tr>
<tr>
<td>Suffix:</td>
<td>Suffix: JR</td>
</tr>
<tr>
<td>Occupation: President &amp; CEO, Horizon Facility Services</td>
<td>Occupation: Medical Device Sales</td>
</tr>
<tr>
<td>Title in the applicant’s business: CEO/Financial Backer</td>
<td>Title in the applicant’s business: Security Manager</td>
</tr>
<tr>
<td>Also known as:</td>
<td>Also known as:</td>
</tr>
<tr>
<td>Date of birth:</td>
<td>Date of birth:</td>
</tr>
<tr>
<td>Address Line 1:</td>
<td>Address Line 1:</td>
</tr>
<tr>
<td>DOH Redacted</td>
<td>DOH Redacted</td>
</tr>
<tr>
<td>Address Line 2:</td>
<td>Address Line 2:</td>
</tr>
<tr>
<td>Address Line 3:</td>
<td>Address Line 3:</td>
</tr>
<tr>
<td>City:</td>
<td>City:</td>
</tr>
<tr>
<td>DOH Redacted</td>
<td>DOH Redacted</td>
</tr>
<tr>
<td>State:</td>
<td>State:</td>
</tr>
<tr>
<td>Phone:</td>
<td>Phone:</td>
</tr>
<tr>
<td>DOH Redacted</td>
<td>DOH Redacted</td>
</tr>
<tr>
<td>Fax: N/A</td>
<td>Fax: N/A</td>
</tr>
<tr>
<td>Email:</td>
<td>Email:</td>
</tr>
</tbody>
</table>
Pennsylvania Department of Health
Medical Marijuana Grower/Processor Permit Application

Address Line 1: [DOH Redacted]  Address Line 2: [DOH Redacted]
Phone: [DOH Redacted]  Fax: N/A  Email: [DOH Redacted]

Name and Residential Address

First Name: Martin  Middle Name: Karl  Last Name: Till  Suffix: [DOH Redacted]
Occupation: Regional President at J.G. Petrucci Company
Title in the applicant’s business: GM
Also known as: [DOH Redacted]  Date of birth: MM/DD/YYYY
Address Line 1: [DOH Redacted]  Address Line 2: [DOH Redacted]
Phone: [DOH Redacted]  Fax: N/A  Email: [DOH Redacted]

Name and Residential Address

First Name: Megan  Middle Name: P  Last Name: Shank  Suffix: [DOH Redacted]
Occupation: Director of Sales & Medical Cannabis Education
Title in the applicant’s business: VP Sales Education
Also known as:  Date of birth: [DOH Redacted]
Address Line 1: [DOH Redacted]  Address Line 2: [DOH Redacted]
Phone: [DOH Redacted]  Fax: N/A  Email: [DOH Redacted]

Name and Residential Address

First Name: Teresa  Middle Name: F  Last Name: Winslow  Suffix: [DOH Redacted]
Occupation: Management Consultant/University Executive
Title in the applicant’s business: QC Manager
Also known as:  Date of birth: [DOH Redacted]
Address Line 1: [DOH Redacted]  Address Line 2: [DOH Redacted]
Phone: [DOH Redacted]  Fax: N/A  Email: [DOH Redacted]

Name and Residential Address

First Name: Josh  Middle Name:  Last Name: Genderson  Suffix: [DOH Redacted]
Pennsylvania Department of Health
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Occupation: President & CEO
Title in the applicant’s business: COO
Also known as: [Redacted]
Date of birth: [Redacted]

Name and Residential Address
First Name: Joseph
Middle Name: P
Last Name: Salvemini
Suffix: 
Occupation: Security Consultant
Title in the applicant’s business: Head Diversion Control
Also known as: [Redacted]
Date of birth: [Redacted]

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

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

Name and Residential Address
First Name: N/A
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: 

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

[Signature]
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 grower/processor facility.

Section 7 – Civil and Administrative Action

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

<table>
<thead>
<tr>
<th>Civil and Administrative Action</th>
<th>Yes</th>
<th>No</th>
</tr>
</thead>
<tbody>
<tr>
<td>The applicant has never responded to an action resulting in sanctions, disciplinary actions or civil monetary penalties being imposed relating to a registration, license, permit or any other authorization to grow, process or dispense medical marijuana in any state.</td>
<td>☒</td>
<td></td>
</tr>
<tr>
<td>The applicant has never responded to a civil or administrative action relating to a registration, license, permit or authorization to grow, process or dispense medical marijuana in any state.</td>
<td>☒</td>
<td></td>
</tr>
<tr>
<td>The applicant has never been accused of obtaining a registration, license, permit or other authorization to operate as a grower, processor or dispensary of medical marijuana in any jurisdiction by fraud, misrepresentation, or the submission of false information.</td>
<td>☒</td>
<td></td>
</tr>
<tr>
<td>No civil or administrative action has been taken against the applicant under the laws of the Commonwealth or any other state, the United States or a military, territorial or tribal authority relating to a principal, operator, financial backer or employee of the applicant’s profession, or occupation or fraudulent practices, including fraudulent billing practices.</td>
<td>☒</td>
<td></td>
</tr>
</tbody>
</table>
## Schedule A: Civil or Administrative History Incident

<table>
<thead>
<tr>
<th>Defendant</th>
<th>Name of Case &amp; Docket #</th>
<th>Nature of Charge or 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>N/A</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
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<tr>
<td></td>
<td></td>
<td></td>
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<td></td>
<td></td>
</tr>
</tbody>
</table>

## Part D – Plan of Operation

*(Scoring Method: 550 Points)*

A **Plan of Operation** is required for all Grower/Processor permit applications. The **Plan of Operation** must include a timetable outlining the steps the applicant will take to become operational within six months from the date of issuance of a permit. The plan of operation must also describe how the applicant’s proposed business operations will comply with statutory and regulatory requirements necessary for the continued operation of the facility.

### Plan of Operation

**What must be covered in a Plan of Operation?**

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

- Security and surveillance
- Employee qualifications and training
- Transportation of medical marijuana and medical marijuana products
- Storage of seeds, immature medical marijuana plants, medical marijuana plants, medical marijuana, and medical marijuana products
- Labeling of medical marijuana products
- Inventory management, including management of returns of medical marijuana product that is expired, damaged or recalled
- Appropriate nutrient practice, using fertilizers or hydroponic solutions, and the recording of information on the use of fertilizers and growth additives
- Quality control and testing of medical marijuana and medical marijuana products for potential contamination
- Growing of medical marijuana, including a detailed summary of policies and procedures for its growth and harvest
- Recordkeeping
- Preventing unlawful diversion of medical marijuana and medical marijuana products
Pennsylvania Department of Health
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- Timetable outlining the steps required for the applicant to become operational within six months from the date of issuance of a permit

<table>
<thead>
<tr>
<th>Activity</th>
<th>Estimated Date</th>
</tr>
</thead>
<tbody>
<tr>
<td>Department awards permit to company</td>
<td>9/1/17</td>
</tr>
<tr>
<td>Finalize all plans and designs; select contractor</td>
<td>9/20/17</td>
</tr>
<tr>
<td>Submit building permit application to municipality</td>
<td>9/22/17</td>
</tr>
<tr>
<td>Begin Demolition activities</td>
<td>10/1/17</td>
</tr>
<tr>
<td>Begin construction</td>
<td>11/15/17</td>
</tr>
<tr>
<td>Begin management interviewing process</td>
<td>12/1/17</td>
</tr>
<tr>
<td>Begin management training process</td>
<td>12/15/17</td>
</tr>
</tbody>
</table>

If more space is required for the Operational Timetable, please submit additional information in a separate document titled “Operational Timetable (Cont’d.)” in accordance with the attachment file name format requirements and include it with the attachments.

Section 9 – Employee Qualifications, Description of Duties and Training

A. Please provide a description of the duties, responsibilities, and roles of each principal, financial backer, operator and employee.

1. Please see attachment entitled BrightStar BioMedics LLC_03202017_Grower-Processor_employee qualifications, description of duties and training (contd.)

2.
<table>
<thead>
<tr>
<th>3.</th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td>4.</td>
<td></td>
</tr>
<tr>
<td>5.</td>
<td></td>
</tr>
<tr>
<td>6.</td>
<td></td>
</tr>
<tr>
<td>7.</td>
<td></td>
</tr>
<tr>
<td>8.</td>
<td></td>
</tr>
</tbody>
</table>

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

1. Please see attachment entitled BrightStar BioMedics LLC_03202017_Grower-Processor_employee qualifications, description of duties and training (contd.)

2.  

3.  

4.  

5.  

6.  

7.  

8.  

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

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

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

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

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

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

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

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

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

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

Section 10 – Security and Surveillance

A GROWER/PROCESSOR FACILITY 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 SEEDS, IMMATURE MEDICAL MARIJUANA PLANTS, MEDICAL MARIJUANA PLANTS, MEDICAL MARIJUANA AND MEDICAL MARIJUANA
PLEASE PROVIDE A SUMMARY OF YOUR PROPOSED SECURITY AND SURVEILLANCE EQUIPMENT AND MEASURES THAT WILL BE IN PLACE AT YOUR PROPOSED FACILITY AND SITE. THESE MEASURES SHOULD COVER, BUT ARE NOT LIMITED TO, THE FOLLOWING: GENERAL OVERVIEW OF THE EQUIPMENT, MEASURES AND PROCEDURES TO BE USED, ALARM SYSTEMS, SURVEILLANCE SYSTEM, STORAGE, RECORDING CAPABILITY, RECORDS RETENTION, PREMISES ACCESSIBILITY, AND INSPECTION/SERVICING/ALTERATION PROTOCOLS.
Section 11 – Transportation of Medical Marijuana

A. Transportation

By checking “Yes,” you affirm that any delivery of medical marijuana to any other medical marijuana grower/processor facility, dispensary, or approved laboratory within the Commonwealth will adhere to the following:

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

- Medical marijuana will only be delivered between 7 a.m. and 9 p.m.
- Medical marijuana will not be transported to any location outside of this Commonwealth.
- A global positioning system will be used to ensure safe, efficient delivery of the medical marijuana to a medical marijuana organization or approved laboratory.

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

- At least one delivery team member will remain with the vehicle at all times that the vehicle contains medical marijuana.
- Each delivery team member shall have access to a secure form of communication with the grower/processor, such as a cellular telephone, at all times that the
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vehicle contains medical marijuana.

- Upon demand, each delivery team member shall produce an identification badge or card to the Department or its authorized agents, law enforcement or other Federal, State, or local government officials if necessary to perform the government officials’ functions and duties.

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

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

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

- A delivery team shall proceed in a transport vehicle from the facility, where the medical marijuana is loaded, directly to the medical marijuana organization or approved laboratory, where the medical marijuana is unloaded, without unnecessary delays. Notwithstanding the foregoing, a transport vehicle may make stops at multiple facilities or approved laboratories, 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 grower/processor’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 or approved laboratory.

- 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
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The transport manifest 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 or approved laboratory receiving the delivery, and the name of and contact information for a representative of the medical marijuana organization or approved laboratory.
- The quantity, by weight or unit, of each medical marijuana harvest batch, harvest lot or process lot contained in the transport, along with the identification number for each batch or lot.
- The date and approximate time of departure.
- The date and approximate time of arrival.
- The transport vehicle’s make, model, and license plate number.
- The identification number of each member of the delivery team accompanying the transport.
- When a delivery team delivers medical marijuana to multiple medical marijuana organizations or approved laboratories, the transport manifest must correctly reflect the specific medical marijuana in transit; each recipient will also provide the grower/processor with a printed receipt for the medical marijuana received.
- All medical marijuana being transported must be packaged in shipping containers and labeled in accordance with § 1151.34 (relating to packaging and labeling of medical marijuana).
- Separate copies of the transport manifest will be provided to each recipient receiving the medical marijuana described in the transport manifest. To maintain confidentiality, a grower/processor may prepare separate manifests for each recipient.
- The applicant acknowledges that, upon request, a copy of the printed transport manifest, and any printed receipts for medical marijuana being transported, will be provided to the Department or its authorized agents, law enforcement, or other Federal, State, or local government officials if necessary to perform the government officials’ functions and duties.
C. Please describe your plan regarding the transportation of medical marijuana and medical marijuana products. For example, explain whether you plan to maintain your own transportation operation as part of the facility operation, or whether you will use a third-party contractor. If you choose to use your own transportation operation, please provide the number and type of vehicles that will be used to transport medical marijuana and medical marijuana products, the training that will be provided to employees that will transport medical marijuana and medical marijuana products, and any additional measures you will take to prevent diversion during transport. If you will be using a third-party contractor for transporting medical marijuana and medical marijuana products, please explain the steps you will take to guarantee the third-party contractor will be compliant with the transportation requirements under the Act and regulations.
DOH Redacted
Section 12 – Storage of Medical Marijuana

A. Storage Requirements

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

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

- There will be separate, locked, limited access areas for the storage of seeds, immature medical marijuana plants, medical marijuana plants, and medical marijuana that are expired, damaged, deteriorated, mislabeled, contaminated or recalled or whose containers or packaging have been opened or breached, until the seeds, immature medical marijuana plants, medical marijuana plants and medical marijuana are destroyed or otherwise disposed of, as required by § 1151.40 (relating to the management and disposal of medical marijuana waste).

- All storage areas will be maintained in a clean and orderly condition and free from infestation by insects, rodents, birds, and pests.

- A separate and secure area for temporary storage of medical marijuana that is awaiting disposal will be established.

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

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

B. Please describe your plans regarding the storage of medical marijuana within your facility:
Section 13 – Packaging and Labeling of Medical Marijuana

A. Packaging Requirements

By checking “Yes” to any statement, you affirm that you will implement a quality control process to ensure that the packaging meets all of the following:

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

- Each form of medical marijuana prepared for sale will be packaged and labeled at its facility. The original seal of a package may not be broken, except for quality control testing at an approved laboratory, for adverse loss investigations conducted by the Department, or by a dispensary that purchased the medical marijuana.

- Medical marijuana will be in a package that minimizes exposure to oxygen.

The packaged medical marijuana will be all of the following:

- Child-resistant
- Tamper-proof or tamper-evident
- Light-resistant and opaque
- Resealable

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

Please limit your response to no more than 5,000 words.
# B. Labeling Requirements

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

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

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

Each process lot of medical marijuana will be identified with a unique identifier.

Prior written approval of the Department will be obtained regarding the content of any label to be affixed to a medical marijuana package.

By checking “Yes,” you affirm that each label will:

<table>
<thead>
<tr>
<th></th>
<th>Yes</th>
<th>No</th>
</tr>
</thead>
<tbody>
<tr>
<td>Be easily readable.</td>
<td>☒</td>
<td>☐</td>
</tr>
<tr>
<td>Be made of weather-resistant and tamper-resistant materials.</td>
<td>☒</td>
<td>☐</td>
</tr>
<tr>
<td>Be conspicuously placed on the package.</td>
<td>☒</td>
<td>☐</td>
</tr>
<tr>
<td>Include the name, address and permit number of the grower/processor.</td>
<td>☒</td>
<td>☐</td>
</tr>
<tr>
<td>List the form, quantity and weight of medical marijuana included in the package.</td>
<td>☒</td>
<td>☐</td>
</tr>
<tr>
<td>List the amount of individual doses contained within the package and the species and percentage of THC and CBD.</td>
<td>☒</td>
<td>☐</td>
</tr>
<tr>
<td>Contain an identifier that is unique to a particular harvest batch of medical marijuana, including the number assigned to each harvest lot or process lot in the harvest batch.</td>
<td>☒</td>
<td>☐</td>
</tr>
</tbody>
</table>
• Include the date the medical marijuana was packaged. ☒ ☐
• State the employee identification number of the employee preparing the package and packaging the medical marijuana. ☒ ☐
• State the employee identification number of the employee shipping the package, if different than the employee preparing the package and packaging the medical marijuana. ☒ ☐
• Contain the name and address of the dispensary to which the package is to be sold. ☒ ☐
• List the date of expiration of the medical marijuana. ☒ ☐
• Include instructions for proper storage of the medical marijuana in the package. ☒ ☐
• Contain a warning that the medical marijuana must be kept in the original container in which it was dispensed. ☒ ☐
• Contain a warning that unauthorized use is unlawful and will subject the purchaser to criminal penalties. ☒ ☐
• Contain the following warning stating:

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

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

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

C. PLEASE DESCRIBE YOUR PROCESS FOR CREATING AND MONITORING THE LABELING USED FOR MEDICAL MARIJUANA PRODUCTS:

Overview
BrightStar Biomedics will develop and implement standard operating procedures (SOPs) regarding the packaging, labeling and monitoring of labeling used for medical marijuana products that are in full compliance with 28 PA Code §1151.34 (regarding packaging and labeling of medical marijuana). Elements of these SOPs will be adopted, and amended as necessary, from those employed by our medical marijuana grower/processor affiliates including Holistic Industries LLC of Maryland; Holistic Industries Inc. of Massachusetts; and Holistic Remedies and Organic Wellness of Washington DC.

BrightStar Biomedics will ensure that patients and caregivers are given appropriate information by strictly adhering to proper packaging, labeling, and monitoring procedures. No medical marijuana will be delivered to a medical marijuana organization before being packaged in a container that has been confirmed to be clearly and accurately labeled.

Packaging Plan

Upon processing tested and approved medical marijuana into authorized medical marijuana products, BrightStar Biomedics’ processing agents will create and record a unique identifier for each process lot of medical marijuana for inventory tracking purposes. Doing so will allow for the accurate tracking of products through the extraction, infusion, packaging, and labeling processes using our electronic inventory tracking and recordkeeping program. Appropriate staff will be trained to enter all necessary information and actions taken to each process lot as it moves through the production process.

All medical marijuana will be packaged at several key checkpoints during the production process to allow for the identification of the products, facilitate a comprehensive chain of custody report, and maintain the integrity, purity, and pharmaceutical quality of the products. These key checkpoints include:

- Upon the conclusion of the curing process (cured medical marijuana will be bulk-packaged while awaiting internal and independent testing results)
- Upon the conclusion of the extraction process (extracted medical marijuana will again be bulk-packaged while awaiting internal and independent testing results)
- Upon the conclusion of the infusion process (infused medical marijuana products will again be bulk-packaged while awaiting internal and independent testing results)
- Upon successfully passing final product testing (final medical marijuana products approved for sale to dispensaries will be packaged in a manner appropriate for eventual dispensation to patients)
- Upon an approved purchase order for tested final products (sets of unit-packages of final and approved medical marijuana products will be bulk-packaged for shipment)
BrightStar Biomedics’ inventory department will always package medical marijuana in a package that minimizes exposure to oxygen and that is:

- Child-resistant
- Tamper-proof or tamper-evident
- Light-resistant and opaque
- Resealable

**Label-Making System**

All labels created must be indelible and tamper-evident and will be made of weather-resistant material. To ensure this, BrightStar Biomedics will purchase an adequate number of label-maker systems such as those manufactured by Intermec (e.g., Indelible VOID Label), which are capable of printing tamper-evident and weather resistant labels suitable for labeling shipment packages.

Labeling equipment will be included in the daily cleaning schedule for inventory agents. Appropriate staff will be trained in the proper use and functionality of this label-making equipment.

**Label Information**

In accordance with our SOPs and in full compliance with 28 PA Code §1151.34 (regarding packaging and labeling of medical marijuana), BrightStar Biomedics will package and label at our facility each form of medical marijuana prepared for independent laboratory testing or for sale. The original seal of a package will not be broken, except for quality control testing at an approved laboratory, for adverse loss investigations conducted by the Department or by a dispensary that purchased the medical marijuana.

BrightStar Biomedics will only transport medical marijuana in a sealed and properly labeled package. Each container of medical marijuana will be labeled in English, in clearly printed type and in a sufficiently legible font size. Labels must be easily readable and conspicuously placed on the package. Pursuant to protocol, BrightStar Biomedics will inspect each label to ensure it properly identifies:
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- The name, address, and permit number of BrightStar Biomedics
- The form of medical marijuana in the package
- The quantity of medical marijuana in the package
- The weight of medical marijuana in the package
- The species of medical marijuana
- The amount of individual doses contained within the package
- The percentage of THC and CBD (and other cannabinoids present in accordance with independent testing results)
- The unique harvest batch numbers identified assigned to the medical marijuana, including the unique harvest lot and process lot numbers
- The date of packaging
- The employee identification number of the employee preparing the package and packaging the medical marijuana
- The employee identification number of the employee shipping the package, if different than the employee preparing the package and packaging the marijuana
- The name and address of the dispensary to which the package is to be sold (or of the approved laboratory which will conduct the required independent testing)
- The date of expiration of the medical marijuana
- Instructions for the proper storage of the medical marijuana in the package
- Any other information required by the Department

All labels will also include the following warnings:

- “This product is for medicinal use only. Women should not consume during pregnancy or while breastfeeding except of the advice of the practitioner who issued the certification and, in the case of breastfeeding, the infant’s pediatrician. This product might impair the ability to drive or operate heavy machinery. Keep out of reach of children.”
- “Medical marijuana must be kept in the original container in which it was dispensed.”
- “Unauthorized use of medical marijuana is unlawful and will subject the purchaser or user to criminal penalties.”

For ease of entry into the BrightStar Biomedics electronic tracking and recordkeeping system, all labels will include a barcode that communicates all of the information listed above into the database when scanned.

Pursuant to SOPs, labels on packages of medical marijuana may not contain any false or misleading statement or design. Inventory agents and transport agents will be trained to carefully inspect packaging and confirm compliance with this rule upon preparing a shipment.
BrightStar Biomedics will also inspect each label to ensure that the label does not bear:

- Any resemblance to the trademarked, characteristic or product-specialized packaging of any commercially available food or beverage product
- Any statement, artwork or design that could reasonably lead an individual to believe that the package contains anything other than medical marijuana
- Any seal, flag, crest, coat of arms or other insignia that could reasonably mislead an individual to believe that the product has been endorsed, manufactured or approved for use by any state, county or municipality or any agency thereof
- Any cartoon, color scheme, image, graphic or feature that might make the package attractive to children

BrightStar Biomedics will obtain the prior written approval of the Department of the content of any label to be affixed to a medical marijuana package.

**Label Compliance Inspections**

BrightStar Biomedics may transport and deliver medical marijuana to a medical marijuana organization or an approved laboratory in this Commonwealth in accordance with 28 PA Code §1151.35 (regarding transportation of medical marijuana). All medical marijuana being transported shall be packaged in shipping containers and labeled in accordance with 28 PA Code §1151.34 (relating to packaging and labeling of medical marijuana).

In accordance with 28 PA Code §1151.36 (regarding transport manifest), before transport, BrightStar Biomedics shall generate a printed or electronic transport manifest that accompanies every transport vehicle. In addition to other required information, per 28 PA Code §1151.36, this manifest will include:

- The name, address and permit number of the grower/processor (i.e., BrightStar Biomedics), and the name of and contact information for a representative of BrightStar Biomedics who has direct knowledge of the transport
- The name, address and permit number of the medical marijuana organization or approved laboratory receiving the delivery and the name of and contact information for a representative of the medical marijuana organization or approved laboratory
- The quantity, by weight or unit, of each medical marijuana harvest batch, harvest lot or process lot contained in the transport, along with the identification number for each batch or lot
BrightStar Biomedics will provide a copy of the transport manifest to the recipient receiving the medical marijuana described in the transport manifest. To maintain confidentiality, BrightStar Biomedics may prepare separate manifests for each recipient. BrightStar Biomedics shall, if requested, provide a copy of the printed transport manifest, and any printed receipts for medical marijuana being transported, 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. Prior to providing any transport manifest to a recipient entity, the document must first be reviewed and approved by management, who will carefully inspect the accuracy and regulatory compliance of the manifest.

In preparation for transport of medical marijuana:

1. Upon the day of shipment, authorized agents will carefully transfer all itemized products identified on the transport manifest from the vault room to the shipment staging and preparation area for shipment. As items are removed from storage, they will be carefully inspected and reviewed for packaging and labeling compliance, ensuring all items are compliant with Pennsylvania law and regulations and meet our stringent internal quality assurance standards. All quality assurance inspections and confirmations will be recorded in our electronic inventory tracking and recordkeeping system.

2. Once in the shipment staging and preparation room, transport agents will carefully pack each item in the shipment into proper bulk-shipment packaging (i.e., unmarked, tamper-evident opaque boxes affixed with a copy of the transport manifest and sealed with tamper-evident tape) while simultaneously conducting a physical audit, on a line item basis, against the transport manifest to ensure the shipment matches the manifest. Items will undergo a second quality assurance inspection for packaging and labeling compliance and to ensure they are undamaged, unexpired, and otherwise qualified for dispensation. All inspections and confirmations will again be recorded in our electronic inventory tracking and recordkeeping system.

3. Medical marijuana may not be mishandled or mistreated. Unfit and all items failing inspection must be rejected and either corrected (e.g., re-labeled or re-packaged) or transferred to the quarantine room for further inspection and/or destruction and disposal in accordance with company procedures. All rejected items will be replaced with suitable products such that the shipment 100% matches the transport manifest.

4. Once placed in proper bulk shipment packaging, the shipment packaging will be affixed with a label which clearly displays the unique shipment identification number, the description, including the weight, of each item, date and time of the sealing of the package for shipment, the name and signature of the agent who prepared and sealed the package, and the name and address of shipping permittee (i.e., BrightStar Biomedics). Package labels will also display the name and address of the permittee, or other party if applicable, which will receive the shipment.
5. Transport agents will ensure the shipment packaging label is conspicuously located on each package (i.e., must be of sufficient size, unobscured, and in a noticeable location). All labels, including their placement on the package, must be inspected for compliance and approved prior to continuing to the next step in the transportation procedure. All inspections and confirmations will be recorded in our electronic inventory tracking and recordkeeping system.

6. Once packaging labels have been inspected and approved, the shipment packages will be carefully placed into a dedicated lockbox equipped with a GPS tracking device for transportation to the receiving medical marijuana organization.

7. Prior to sealing any shipment packaging, transport agents must carefully inspect the packaged medical marijuana products and again cross-reference items with the transport manifest (which identifies all the products meant for shipment to the same recipient). Any products, which are not being delivered to the same recipient, must be removed and packaged in a separate shipment container. Once confirmed, the transport agent will make a record of the inspection before releasing the shipment for delivery.

Pursuant to our SOPs, either the inventory manager or security manager will oversee all shipment preparation and transport procedures. At least two agents, including at least one security guard, must participate in all shipment preparation procedures, including the packaging and labeling inspections. All shipment preparation activities must take place within the view of our recording surveillance system and be recorded in MJ Freeway.

**Non-Compliant Labels**

As products are initially packaged and labeled during product packaging procedures, and again as products are prepared for shipment to approved laboratories or medical marijuana dispensaries during transportation procedures, BrightStar Biomedics staff will carefully inspect labels for integrity and compliance with both the law and our own internal quality assurance standards. Any label, which is found to be obscured, damaged, illegible, inaccurate, incomplete, or otherwise does not meet regulatory mandates or own our stringent quality assurance standards, will be deemed unacceptable for transportation. Upon any instance of an unfit label, BrightStar Biomedics will take one of the following actions, depending when the unfit label was first identified as such:

- The product will be rejected and returned to product packaging room for proper re-labeling
- BrightStar Biomedics will quarantine the product for further inspection and either:
  - Create and affix a compliant label if the product itself is determined to be safe for dispensation but was simply mislabeled, or
  - Prepare the product for destruction and disposal in accordance with 28 PA Code §1151.40 if the product cannot be accurately identified or determined to be 100% qualified for transportation to an approved laboratory or dispensary
Upon any instance where a new label is created and affixed to packaging, it must be re-inspected for compliance before being accepted and released for transportation. All labeling and monitoring actions will be recorded in BrightStar Biomedics’ electronic inventory tracking and recordkeeping system, including the unique employee identification number of the agent completing these actions.

Quarantine Storage

BrightStar Biomedics will be equipped with a secure quarantine room for the inspection, and destruction/disposal (if necessary) of processed products, including products whose packaging or labeling does not meet regulatory or internal quality assurance standards. Our quarantine room will be a separate locked, alarmed, and monitored limited-access area used exclusively for the storage of medical marijuana products that are expired, damaged, deteriorated, mislabeled, contaminated, recalled, or whose containers or packaging have been opened or breached. Mislabeled products will remain in quarantine until either cleared by authorized staff to be affixed with a newly created and compliant label, or removed from our facility in accordance with our Department approved destruction and disposal protocol.

Within the quarantine room, BrightStar Biomedics will maintain an appropriate number of commercial-grade TL30 safes that meet DEA requirements for the storage of Schedule I and II drugs and/or an appropriate number of secure, lockable air-tight storage bins for storage of all quarantined products. These safes and storage bins will be utilized as single-purpose, dedicated units for the secure storage of specific types of quarantined products, and will be labeled accordingly. Specifically, there will be a safe/bin dedicated for mislabeled products.

The purpose of this segregation system is to: (a) allow for a proper investigation or examination of the products without risk of confusion or other concerns which could affect the integrity of an investigation or examination, (b) facilitate the organization of the storage area, (c) facilitate the accuracy and integrity of related recordkeeping, and (d) facilitate the orderly destruction, disposal, and/or removal of unsalvageable medical marijuana products.

Label Inspection Training

All inventory and transport agents will be expected to have a thorough understanding of proper packaging labeling of medical marijuana. Employees responsible for packaging, label creation, affixing labels, label and packaging inspections, shipment staging and preparation, and transportation of medical marijuana will be extensively trained in and tested on – both upon
hire and during annual refresher training – creating, identifying and properly handling compliant and non-compliant labels.

The label inspection protocol that all applicable agents will be trained in will include the following steps:

- Learning required information that must appear on each label created by our organization
- Creating and affixing compliant labels using our label making equipment
- Carefully inspecting all packages to confirm the presence of a label that identifies all essential information required by 28 PA Code §1151.34 (regarding packaging and labeling of medical marijuana)
- Confirming the presence of a barcode that allows for accurate scanning of each medical marijuana package into the electronic inventory tracking and recordkeeping system
- Proper handling of medical marijuana packages that do not have a compliant label attached, including quarantine, inspection, re-labeling, and destruction/disposal procedures

The supervisor in charge of overseeing processing operations at BrightStar Biomedics will be responsible for the presence of a compliant label on every package shipped. All packaging and labeling activities will be monitored and recorded by our video surveillance system, and failure by any employee to adhere to the inspection protocol outlined above may lead to suspension and/or termination.

Section 14 – Inventory Management

<table>
<thead>
<tr>
<th>A. Electronic Tracking System</th>
<th>Yes</th>
<th>No</th>
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<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>
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<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, use and sale of seeds, immature medical marijuana plants or medical marijuana plants, the funds received by a grower/processor for the sale of medical marijuana to another medical marijuana organization, the disposal of medical marijuana waste and the recall of defective medical</td>
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marijuana.

B. Inventory Management

By checking “Yes” to any statement, you affirm that your grower/processor facility will maintain an accounting of, and an identifying number for, the following inventory data in the electronic tracking system prescribed by the Department:

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 number, weight, and type of seeds.
- The number of immature medical marijuana plants.
- The number of medical marijuana plants.
- The number of medical marijuana products ready for sale.
- The number of damaged, defective, expired, or contaminated seeds, immature medical marijuana plants, medical marijuana plants and medical marijuana products awaiting disposal.
- Inventory controls and procedures will be established for the conducting of monthly inventory reviews and annual comprehensive inventories of medical marijuana at the facility.
- Inventory reviews of medical marijuana plants in the process of growing and medical marijuana and medical marijuana products that are being stored for future sale shall be conducted monthly.
- Comprehensive inventories of seeds, immature medical marijuana plants, medical marijuana plants, medical marijuana and medical marijuana products shall be conducted at least annually.
- A written or electronic record of the inventory reviews and comprehensive inventories must be created and maintained.
- The written or electronic record will include the date of the inventory, a summary of the inventory findings, and the employee identification numbers and titles or positions of the individuals who conducted the inventory.
PLEASE PROVIDE AN EXPLANATION OF ANY RESPONSES ABOVE THAT WERE ANSWERED AS A “NO” AND HOW YOU WILL MEET THESE REQUIREMENTS BY THE TIME THE DEPARTMENT DETERMINES YOU TO BE OPERATIONAL UNDER THE ACT AND REGULATIONS:

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

C. PLEASE DESCRIBE YOUR APPROACH REGARDING THE IMPLEMENTATION OF AN INVENTORY MANAGEMENT PROCESS. THIS APPROACH MUST ALSO INCLUDE A PROCESS THAT PROVIDES FOR THE RECALL OF MEDICAL MARIJUANA AND THE MANAGEMENT OF MEDICAL MARIJUANA PRODUCT RETURNS FROM A DISPENSARY:
DOH Redacted
Section 15 – Management and Disposal of Medical Marijuana Waste

A. Medical Marijuana Waste

By checking “Yes,” you affirm that medical marijuana waste will be stored, managed, and disposed of in accordance with § 1151.40 (relating to management and disposal of medical marijuana waste).

B. Please detail your plan for the management and disposal of medical marijuana waste, in accordance with §§ 1151.22 (relating to plans of operation) and 1151.40 (relating to management and disposal of medical marijuana waste):
A. Diversion Prevention

You acknowledge that you have the opportunity, only within 30 days from the date the Department determines you to be operational, to import medical marijuana seeds and immature medical marijuana plants.

B. Please provide a summary of the procedures that you will implement at the proposed grower/processor facility and site for the prevention of the unlawful diversion of seeds, immature medical marijuana plants, medical marijuana plants, medical marijuana and medical marijuana products, along with the process that will be followed when evidence of theft/diversion is identified:
Section 17 – Growing Practice

A. Growing of Medical Marijuana

By checking “Yes” to any statement, you affirm that your facility will maintain the following practices for the growing of medical marijuana:

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.

- In accordance with § 1151.27 (requirements for growing and processing medical marijuana), only pesticides, fungicides or herbicides that are listed and published in the Pennsylvania Bulletin will be used.

- A log of all actions taken to detect pests or pathogens, and the measures taken for control, will be maintained.

- Visual inspections of growing plants and harvested plant material will be performed to ensure there is no visible mold, mildew, pests, rot or grey or black plant material that is greater than an acceptable level as determined by the Department.

- A system to monitor, record, and regulate temperature, humidity, ventilation,
lighting and water supply will be installed.

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

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

B. Please provide a summary of which pesticides, if any, will be used in the growing process:

Pesticides Overview
BrightStar BioMedics has developed and will implement a set of written growing practices that include standard operating procedures (SOPs) regarding the use of pesticides. Fungicides and pesticides used to control disease and kill garden pests can be toxic to humans and to the environment. Toxins from chemicals used in medical marijuana crops seep into the growing medium and can harm the rhizosphere and beneficial insects. Therefore it is of the utmost importance that the only pesticide treatments used are deemed safe for human consumption.

BrightStar BioMedics employs a comprehensive Integrated Pest Management (IPM) system to our pest protection procedures. Our IPM system is based on proactive actions focused on exclusion and prevention and our goal is to completely eliminate the need for application of pest controls, even organic ones. In the event that application of pest controls becomes necessary, BrightStar BioMedics will use only pesticides, fungicides or herbicides that are approved by the Department of Agriculture for use on medical marijuana plants and listed in Appendix A of 28 PA Code §1151 (relating to acceptable pesticide active ingredients for use) and in accordance with the Pennsylvania Pesticide Control Act of 1973 (3 P.S. §§ 111.21—112). BrightStar BioMedics will only use these pesticides, fungicides or herbicides in a manner that is approved by the Department of Agriculture and in compliance with applicable Federal law and regulations.

Integrated Pest Management
The U.S. Environmental Protection Agency (EPA) on its website recommends IPM as a smart, sensible and sustainable approach to pest control:

- Smart because IPM creates a safer and healthier working environment by managing pests and reducing worker’s exposure to pests and pesticides
- Sensible since practical strategies are used to reduce sources of food, water and shelter for pests in growing structures and surrounding areas
- Sustainable because the emphasis is on prevention, which makes it an economically advantageous approach
IPM has many definitions but the one used by the University of California system best captures the approach of BrightStar BioMedics’ IPM:

“Integrated pest management (IPM) is an ecosystem-based strategy that focuses on long-term prevention of pests or their damage through a combination of techniques such as biological control, habitat manipulation, modification of cultural practices, and use of resistant varieties. Pesticides are used only after monitoring indicates they are needed according to established guidelines, and treatments are made with the goal of removing only the target organism. Pest control materials are selected and applied in a manner that minimizes risks to human health, beneficial and non-target organisms, and the environment.”

Through the prevention, exclusion, treatment and monitoring of pests, BrightStar BioMedics’ IPM takes a low-toxicity approach to preserve the safety and marketability of our medical marijuana. Our plan is based on the constant review and analysis of our pest control tactics and outcomes. It is aimed at being a holistic pest prevention program that includes spray and drench approaches. BrightStar BioMedics employees will be trained in our prevention methods (including exclusion and routine scouting) to help avoid future pest outbreaks.

Should any pesticide be applied, BrightStar BioMedics shall maintain a record of each application that includes:

- The date of application;
  - For a pesticide requiring a re-entry time, the date of application must include the hour completed
- The place of application, including the specific block, section, or immature medical marijuana plants or medical marijuana plants treated
- The size of the area treated
- The product name of every pesticide used
- The EPA product registration number. This requirement is unnecessary for products exempted under section 25 of the Federal Insecticide, Fungicide, and Rodenticide Act (7 USCA §136w)
- The total amount of every pesticide used in pounds, ounces, gallons or liters applied to a treated area
- The dosage or rate of application of every pesticide used
- If applicable, the employee identification numbers of the individuals involved in making the pesticide and the employee identification numbers of the individuals making or supervising the application
- Copies of pesticide labels and Safety Data Sheets for the pesticides used at the facility

BrightStar BioMedics will create these records within 24 hours of the completion of the application and these records will be maintained for at least 4 years. Upon request, all such records will be made immediately available to the Department or its authorized agents and medical personnel or first responders in the event of an emergency. Record will also be made available to the Department of Agriculture upon request.
It is our mission to produce medical marijuana that is pharmaceutical-grade and safe for patients. IPM is a critical element in creating a healthy environment for plants to be grown in a manner that protects the health of patients and our staff. Proper use of IPM reduces the need for pesticides and ultimately protects workers and patients while delivering safe and contaminant-free medical marijuana.

**Major Pests and Plant Diseases**
Spider mites, aphids, thrips, white flies, fungus gnats are among the major pest threats facing medical marijuana cultivation operations, while powdery mildew, botrytis and fusarium comprise the bulk of the diseases identified on a daily basis. The recalls ordered in Colorado last year for marijuana products containing pesticides serve as a reminder that pest problems continue to plague the industry. Utilizing IPM can help reduce the need to use any pesticides, organic or not, as well as mitigate the risk of unwanted pests wreaking havoc on a medical marijuana harvest.

**Sticky Stakes**
Early detection and identification is an integral component of our IPM. BrightStar BioMedics will use sticky stakes as an early detection system for the presence of pests. Sticky stakes are free of chemical pesticides and provide help detecting the presence of pests before they become a problem. This approach allows us to prepare a response to pest presence that is specifically targeted (by identifying the pests on the traps) and helps monitor variations in the populations.

Sticky stakes will be placed in every area that houses plant tissue and other strategic areas. Insect monitoring sticky traps will be placed at a rate of one per 200 square feet to provide quick recognition of pest problems. The sticky traps are not effective at remediating pests, but they provide a sampling tool for estimating total population size and the rate of change in population activity relative to remediation actions. This ensures only the most effective and relevant pesticides will be used, minimizing overall use of pesticides.

**Biological Controls**
Biological controls are essential to any proper IPM solution. Beneficial living organisms such as insects, mites, nematodes or entomopathogenic fungi can all be applied as a method for controlling pests. However, a major hurdle concerning the registration of entomopathogenic fungi as plant protection agents is the possible toxicity of secreted metabolites, especially secondary metabolites. Specific secondary metabolites (e.g., destruxins, erapeptins, oosporein, beauvericin and beauveriolides) produced by the important genera Beauveria, Metarhizium and Tolypocladium tend to be a major concern because the quantities of secondary metabolites produced by these fungi in vivo are typically much less than those secreted in nutrient rich liquid media as in medical marijuana growing media.

BrightStar BioMedics utilizes only organic, food-safe pest remediation measures including predatory insects, inoculated foliar sprays, plant-based essential oils, temperature control and CO2 suffocation techniques. BrightStar BioMedics may choose to introduce beneficial insects to fight pests when they are first detected. Beneficial insects are more effective when introduced at the very early stages of detection as they need some time to establish their presence in the
affected area. The use of sticky stakes will give us this option as that is a very early detection system.

Organic Pesticide Options
The rhizosphere is the narrow region of the growing medium directly around the plant roots. It is teeming with bacteria that feed on sloughed-off plant cells and the proteins and sugars released by roots. The protozoa and nematodes that graze on bacteria are also concentrated near plant roots. Thus, much of the nutrient cycling and disease suppression needed by plants occurs immediately adjacent to roots.

Unfortunately, organic pesticide treatments can also kill off natural pest enemies, “good” insects, while ridding the plants of the problem insects. Therefore, BrightStar BioMedics always will give careful consideration to the effect of the organic pesticide and where it will be used. For instance, mineral oil is sometimes sprayed on plants to eliminate aphids; however, mineral oil would also kill ladybugs, a natural predator of aphids.

According to the EPA, certain plant oils have insecticidal qualities, either killing or repelling pests. For example, jojoba oil kills whiteflies and cinnamon repels ants. Spice-based organic products are currently used by some medical marijuana growers. These natural controls have shown some success in protecting medical marijuana crops. Spice-based solutions are made of oils extracted from herbs such as rosemary, thyme, mint, clove and the dried bud of the flower from the tree *Syzygium aromaticum*. A combination of these extracts can also be used depending of the target pest or pests. Other plants that show insect-fighting potential include lavender, basil, bergamot and patchouli oil. Oil based organic pest control, when sprayed on the plants, tends to degrade rapidly and therefore must be reapplied often. However, they have the benefit of, if specifically targeted, not killing beneficial insects or harming the rhizosphere.

Insecticidal soaps made from coconut oil and bacillus thuringiensis (Bt), which is a disease to insects, are another organic pesticide option. Even though this toxin does not kill insects immediately, treated plant parts will not be damaged because the pest stops feeding within hours. Importantly, Bt spores do not spread to other insects or cause disease outbreaks on their own. Medical marijuana growers must be careful to match the target pest species with a particular Bt toxin protein that is specific for that insect as there are many types of Bt, some of which may not be useful when combatting particular species of pests. Because Bt can harm some insects but have no effect on others, making this pesticide option strategic as beneficial insects employed in the cultivation areas will usually not be harmed by the particular strain of Bt that we will use.

SNS-209 Systemic Insect Control
SNS-209 provides a protective barrier for plants against damaging insects. This barrier is harmless to the plant, but distasteful to mites and other harmful insects. SNS-209 Systemic Insect Control is made up of 100% pure botanical extracts that are highly water soluble. The botanical extracts are all food grade GRAS (Generally Recognized As Safe) materials. SNS-209 Systemic Insect Control is exempt from EPA registration under minimum risk pesticide exempted under FIFRA Section 25(b).
Spider mites, whiteflies, nematodes, scale and other insects destroy plant cells by sucking out their fluids or chewing up the cell walls. SNS-209’s unique formula works by allowing the plant to take up a small amount of rosemic acid from the rosemary plant (EPA Status 25(b) in 28 PA Code §1151 Appendix A). As the plant distributes the rosemic acid throughout its cell walls, a barrier is soon constructed. When an insect starts to suck or chew on the plant it comes in contact with the acid causing the insect to stop eating and move on.

**AzaMax**
AzaMax is a natural product that controls a wide variety of pests and can be used safely in growing medical marijuana. AzaMax is made from special Azadirachtin Technical (EPA Status Section 3 Products in 28 PA Code §1151 Appendix A) extracted using patented extraction technology from Neem, a tree known for its many beneficial uses in agriculture and human health. AzaMax contains Azadirachtin A & B as active ingredients and more than 100 limonoids. AzaMax does not use hard chemical solvents and instead uses food-grade formulation ingredients. This product is OMRI (Organic Materials Review Institute) listed and licensed in all 50 states.

AzaMax is an antifeedant and insect growth regulator that controls pests through starvation and disruptions in their growth cycles. AzaMax effectively controls spider mites, thrips, fungus gnats, aphids, whiteflies, leaf miners, worms, beetles, leafhoppers, scales, mealy bugs, nematodes and other soil borne pests. Notably, this product can be safely applied up one week prior to harvest without affecting the integrity or pharmaceutical quality of the end medicinal product because it leaves no harmful residues on harvested medical marijuana.

**SNS 244C Concentrated Natural Fungicide**
SNS 244C Concentrated Natural Fungicide is made up of 100% pure thyme, clove and rosemary botanical extracts. The botanicals are all food grade GRAS materials. SNS 244C is exempt from EPA registration under minimum risk pesticides exempted under FIFRA Section 25(b).

Airborne “pathogenic” or disease-causing fungi get inside the plant either by making a hole in its skin (epidermis), or by growing in through the plant’s breathing holes (stomata). Then they either poison and kill the plant cells before absorbing food from them or simply steal nutrients from the living cells. Some fungi live in the soil and enter roots. They can either block the water-conducting cells or kill them, causing the plant to wilt. In many cases, the plant is seriously damaged or may even die. Such pathogenic fungi can threaten our crops. As a topical spray, SNS 244C kills the fungus through a biochemical interaction on the spores. Some of the components of SNS 244C are also absorbed systemically by the plant, suppressing the life cycle of the fungal spores and nurturing the plant cells to increase the plant’s ability to fight the disease. This product has been used extensively on medical marijuana crops without adverse effects.

**SNS 203 Concentrated Natural Pesticide Soil Drench and Foliage Spray**
SNS 203 Concentrated Natural Pesticide Soil Drench and Foliage Spray is comprised of pure rosemary and clove botanical extracts. It kills, repels, controls and eliminates fungus gnats, root aphids, thrips, shore flies and whiteflies by attacking fungus and algae, causing pests to dehydrate. This product has also been used extensively on medical marijuana crops without adverse effects.
SNS 217 Spider Mite Control
SNS 217 Spider Mite Control is comprised of 100% pure rosemary botanical extract. The botanicals are all food-grade GRAS materials. SNS 217 is exempt from EPA registration under minimum risk pesticides exempted under FIFRA section 25(b).

Spider mites destroy plant cells by sucking out their contents. SNS 217 provides a barrier that is harmless to the plant, but fatal to the mites. The natural salts from fatty acids derived from rosemary extracts disrupt the mites’ cell structure and permeability of their membranes. Cell contents then leak from damaged cells and the spider mites quickly die. Some of the components of SNS 217 are also absorbed by the plant and then suppress the life cycle of the mites. SNS 217 kills spider mite eggs as well by coating the eggs with an oily shield that disrupts the respiration to the egg; therefore, no hatching will occur—they just dry out. This product is fully biodegradable, is not toxic to animals and should not affect the plant’s metabolism. This product has been used extensively on medical marijuana crops without adverse effects.

SERENADE Garden Disease Control
SERENADE Garden Disease Control offers effective control against diseases without chemicals that can be harmful to people or the environment. This product is approved for organic gardening by the EPA/USDA National Organic Program (NOP) and the OMRI. It provides protection against a broad spectrum of common medical marijuana fungal and bacterial diseases, can be used up to one week prior to harvest and is non-toxic to birds, bees, beneficial insects, fish, and wildlife.

Monterey Garden Insect Spray
Monterey Garden Insect Spray’s active ingredient is Spinosad. Spinosad can be used on medical marijuana to control caterpillars, thrips, leafminers, borers, fruit flies and more. After ingesting the product, pests die within 1 to 2 days. This spray is classified as an organic substance by the USDA NOP and is also OMRI Listed for use in organic production. Monterey Garden Insect Spray will be our primary option over Bt as it is more effective pest control.

Other Pest Control Measures
IPM plans require a systemic approach in order to be successful that start with creating a pest-free buffer zone outside the grower/processor facility by eliminating habitat for any potential pest, spores and organisms that may carry diseases. As such, a robust IPM plan begins in the design phase of any new facility. BrightStar BioMedics’ floor plans design, layouts and mechanical systems will reflect this concern, to optimize that first line of defense that is so critical and imperative in any plan to mitigate risk and prevent pest issues. Incorporating Good Agricultural Practices (GAP) can also help mitigate those risks. Therefore, our cultivation plan will incorporate GAP principles.

Intelligent Facility Design
An important factor to consider when designing a medical marijuana grower/processor facility is the physical prevention of foreign contaminants being introduced into the facility. Contaminants can be introduced by systems that exchange air with the perimeter of the facility and people or materials (including water and new plant stock in the form of cuttings, seedlings or seeds)
entering the facility. To address these issues, our facility will have design features and protocols aimed at minimizing these potential threats.

One design feature of our facility that will help to quickly isolate and contain potential pest and disease outbreak is our choice of relatively smaller grow room sizes (as opposed to a single or very few exceedingly large and open grow rooms). Any identified areas problem can be isolated more easily, and if disposal of a batch becomes the best alternative, then the number of plants affected is smaller. We will also use smaller grow tables that allow for a very thorough inspection of every plant during routine daily inspections. Our preferred growing methodology is SOG (Sea of Green) and SCROG (Screen of Green), depending on the variety of medical marijuana being grown. These techniques will produce shorter plants that are easier to scout for disease and pest and have the added benefit of shortening the duration of the vegetative cycle or overall time from propagation to finished product (minimizing the opportunity for pests to take hold).

Our floor plan design will provide for an easy flow of Work In Progress (WIP). The key element to achieve this is positioning vegetation, bloom, drying, curing, packaging/labeling and other processing rooms so that the plant material is always moving in one specific direction between rooms. While advancing through the process, plant material should never move back and forth.

**Plant Monitoring**

Another important element in our systemic approach to IPM is the introduction of procedures to monitor plant health in proactive manner. This will include the collection of randomly selected leaf material from our plants to monitor the brix levels on them. These tests are easy to conduct and can be done in-house using a refractometer. This will allow us to predict a crop's pest pressure, yield potential, quality, and presence/status of important minerals such as calcium and other stressors. The goal of monitoring brix levels is the early detection of the presence of stress factors before medical marijuana plants become symptomatic.

Refractometers measure the light refracting through the ions dissolved on leaf material collected from the plants. It is a measure of nutrient density in the plant’s internal fluids and how efficiently chlorophyll is being produced. It also very indicative of the efficiencies of the growing processes in our facility. It is akin to monitoring the amount of fuel still available for the plant to use in its internal processes. The goal is to maintain the brix levels as close as possible to 12. Levels below 12 indicate that the plant is underperforming and in a way starving for fuel (sugars) needed for its internal processes. Maintaining optimum levels of sugars ultimately translates into the vigorous growth of new plant tissue and higher yields. The goal is to have high brix levels which enhance the plant immune system while providing the desired level of nutrients. Higher brix levels also mean denser plants and better yields per unit area cultivated.

Monitoring calcium levels in the plant is also critical. Using a refractometer, there is a line in its screen that divides the two visible hemispheres. When the dividing line is clean and sharp, it is usually indicative of a calcium deficiency, but it could also be a sign of generalized mineral deficiency since calcium is a carrier of other minerals. If our growing process is providing our plants with all they need to optimize their internal processes and produce vigorous growth, then
the refractometer’s dividing line should be fuzzy, which is indicative of adequate concentrations of essentials ions (nutrients) and desirable calcium levels in the plant tissues.

**Decontamination**

All authorized persons entering the growing and processing areas of the facility will be required to undergo a decontamination process. This process includes undergoing a high-speed air curtain (or showering with water) and dressing in clean work clothes before gaining access to the protected areas of the facility. After pre-admission decontamination protocols have been met, security will clear the individuals seeking access to the restricted areas of the facility. Sanitation standards will also be strictly enforced. Foot baths will be situated in front of each room containing medical marijuana.

With regards to equipment and materials delivered to our facility for use in the cultivation and manufacturing process, all items must be unpacked, inspected, screened, cleaned and sanitized before being approved for entry into the interior of the facility. Packaging for such equipment and materials will be immediately discarded and may not be permitted in the interior areas.

**Air Treatment**

All air exchange systems in the facility (i.e., heating, cooling and air circulation) will be equipped with HEPA filters to prevent entry of airborne contaminants, including pests. Filters will be capable of removing 99.97% of particles with a diameter of 0.3 micrometers and will be periodically replaced as recommended by the manufacturer to minimize the potential of airborne contamination. We will use positive air pressure and proper ventilation in all rooms which may contain medical marijuana in an attempt to mitigate the potential for cross-contamination.

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**Overview**

BrightStar BioMedics is committed to creating a process that delivers contaminant-free, pharmaceutical-grade medical marijuana that is safe for patients. All operations will be conducted in a safe manner to protect patient and employee health while minimizing environmental impact. We have an established set of standard operating procedures (SOPs) for medical marijuana growing methods and procedures incorporating principles and procedures applied in the pharmaceutical and agricultural industries. All SOPs are in compliance with 28 PA Code §1151.27.
BrightStar BioMedics has a carefully designed grow process that follows strict SOPs to ensure the highest quality and safest products possible. The process includes propagation, cultivation, and harvesting and processing (trimming and rework). Environmental variables (e.g., temperature, humidity, light cycle, CO2, ventilation) will be controlled by an iPonic 624 dedicated to each room. Conditions will be adjusted to the specific needs of the strains being grown and the phase of growth at hand.

**Inventory Tracking**

All interactions between agents and plants are recorded in the MJ Freeway electronic inventory tracking and recordkeeping system (or a similar system capable of integrating with the Pennsylvania Department of Health’s (the Department) electronic tracking system). MJ Freeway is a widely utilized, proprietary seed-to-sale inventory tracking system currently used by our medical marijuana industry affiliates in Maryland, Massachusetts, and Washington DC.

MJ Freeway has the capability to track plants from germination through the entire growing and processing process, allowing for accurate real-time inventory records. Upon entering a seed/cutting into the system, a unique tracking number will be issued. All actions taken to the plant, or its batch, will be digitally recorded for instant and long-term analysis purposes. MJ Freeway also allows us to create precise inventory records at a moment’s notice, so any discrepancies or breaks in the chain of custody will become immediately apparent, igniting swift corrective action measures to investigate and resolve issues.

Generally, we will use MJ Freeway to track and record all actions related to growing, harvesting, processing, testing, packaging, and storing plants in accordance with all applicable law and regulations. All entries into the system will include the unique employee identification number of the staff member taking the relevant action so that we know who is/was responsible for each step in our integrated processes.

All appropriately authorized staff members will be thoroughly trained in the use and functionality of the MJ Freeway software system to ensure the accuracy and integrity of our electronic recordkeeping system. Authorized cultivation agents will be issued tablets installed with the MJ Freeway software to enable data entries in real time.

**Propagation**

At the entrance of the propagation area, we will employ an air curtain, a foot bath, and positive pressure to prevent contaminants from entering. At the end of each day all working surfaces must be sanitized with a weak acid solution or Green Cleaner. All equipment and tools will be washed and sanitized in stainless steel sinks. The area itself will be swept daily and mopped at least once a week with a 10% bleach solution. Cloning activities will be carried out in this restricted access area which will house Mother Plants, rooting clones, germinating seeds and seedlings. The propagation area will be maintained at 76-82°F and <65% relative humidity, and CO2 will be kept at 800 ppm. Within this area, we will use 4’ high
output T5 fluorescent lights for the rooting clones and seedlings and Mother Plants will be kept in 10-gallon Smart Pots under a 600W Hortilux Blue lighting system. All lights in this area will run 24/7.

Germination

To germinate seeds, they will be soaked in a 3% hydrogen peroxide sterilization solution for 5 minutes, rinsed in reverse osmosis (R/O) water, then soaked in Kelp extract for 24 hours or until the seed sinks below water line, whichever happens first. Soaked seeds will be planted in 10”x20” trays with 50 inserts filled with a wet (50% moisture) coco coir growing medium.

The trays will be covered with a clear plastic dome, and placed over heating mats with temperature set at 80-83°F for proper germination until the seeds have sprouted. T5 fluorescents are kept 6” above domes. Vents on top of the dome are manipulated to regulate moisture. Droplets of condensation on the walls of the dome are acceptable, but water streaking down the walls should be avoided by adjusting the vents on top. After 70% of seeds have sprouted, the heating mat is removed. Sprouted seeds are entered into MJ Freeway, our electronic inventory tracking system, and assigned a barcode. After 7-10 days, the domes are removed and seedlings are allowed to adjust to their new environment. When most of the seedlings’ third set of leaves is fully developed seedlings are transferred into 3-gallon Smart Pots.

Once in the new containers, immature plants are moved to a room dedicated for vegetative growth. Struggling seedlings and seeds late to sprout are discarded, as BrightStar BioMedics will only keep the strongest genetics. Information related to the discarded seedlings and seeds is recorded in our inventory tracking system. The discarded material is place in the appropriated disposal bags and placed in bins for green waste only, found in every room containing plant tissue.

Cloning

Our Mother Plants are the source of new plant stock, and their care and health is critical importance to the survival of their offspring. To prevent over-harvesting of Mothers, no more than 50 clones may be taken per plant per 3-week period. Cultivation agents will utilize only sterilized razor blades to cut clones from the Mother. During the cloning process, the blades are regularly wiped clean with isopropyl alcohol soaked paper towels to maintain sterilization. Razor blades are discarded at the end of each cloning session.

Ideally, clones must be between 5” and 8” in length from branches of >3mm diameter. During cloning procedures, agents must wear gloves and a dust face mask. Cuttings are immediately placed in a sterilized jar filled with R/O water, and a cut is made underwater at the base of the clone stem at a 45° angle. The lowest leaves are removed, leaving 1-2 internodes with healthy leaves. Tips of the larger leaves may be clipped off to avoid overcrowding in the cloner machine and slow dehydration of cuttings.
Fresh-taken clones will be placed in an EZ-cloner machine (or similar machine) filled with 74-78°F R/O water containing indole-3-butyric acid rooting solution. EZ-cloners are organized off the ground on wire shelving racks, lit by T5 6500K fluorescent fixtures and connected to GFI surge protected outlets. Clones usually root in 10-14 days. A cutting is considered ready for transplant if it has abundant white roots that are 3” or longer. Agents will transplant rooted clones wearing gloves and dust face masks into 3-gallon Smart Pots filled with coco growing medium. Sterilized scissors will be used to trim away any weak and lower leaves creating 2-3” of open stem between soil and lowest leaves.

We will mix mycohorrhizae into our growing medium before transplant and bring it to 50% moisture level by inoculating our 3-gallon Smart Pots with our proprietary blend of beneficial microorganisms during transplant. Thereafter, plants will be inoculated with beneficial microbes through hand watering once a week. After transplant, each new clone is issued its identifying bar code and the information is updated in MJ Freeway. After being properly documented, transplanted clones are taken to a vegetative growth room. Weak clones will be discarded.

After use, the EZ-cloner must be filled with bleach solution and pump operated for 24 hours to fully sterilize all surfaces. After bleach soaking, the machine is then rinsed and allowed to air dry.

**Cultivation**

The life cycle of a medical marijuana plant is mainly comprised of two phases or stages: vegetative and flowering phases. Environmental conditions will be controlled by the iPonic series commercial grade environmental controller (i.e., a system to monitor, record and regulate temperature, humidity, ventilation, lighting and water supply) which will be adjusted to meet plants needs in these different phases. This controller allows users to monitor and control the system remotely via a smartphone or tablet device. Any changes in the environment will generate an automatic text or email alert.

Our grow rooms will be of sufficient size to facilitate disease control and mitigate potential cross-contamination of plants and pest outbreak. Plants will be grown on trays ensuring cultivation agents can reach all areas of the plants with their arms. This helps with daily scouting for diseases and collection of plant tissue for in-house lab analysis.

The trays will be arranged in rows and each tray will be under a series of 315 Ceramic Metal Halide (CMH) fixtures. BrightStar BioMedics prefers this type of lighting system because our tests indicate that 315W Phillips CMH produce the same PAR values of a 600W conventional high pressure sodium (HPS) while delivering better spectrum and producing much less heat. CMH metal halide grow lights are made with an arc tube constructed of a ceramic composite instead of quartz or PCA (polycrystalline alumina). This allows the tube to reach a higher operating temperature. The result is increased growth rate, better overall health and yield of our medical marijuana crops. This is an important element of our systemic approach to reduce our carbon footprint and overall impact on the environment. Note, in conventional
HID lights with arc tubes made of quartz or PCA, the operating temperature is lower and the mix of gases does not necessarily produce optimal light spectrum for photosynthesis.

During vegetative phase of growth (first 4 weeks), lights will be on 18-20 hours, depending on the strain being cultivated, and 4-6 hours off. During light-on cycles, environmental variables will be maintained within the following ranges:

- Temperature: 75-80°F
- Humidity: 70-73%
- CO2: 800-1100ppm (depending on plant size/age).

During dark hours, environmental variables will be set at:

- Temperature: 68-73°F
- Humidity: below 45%
- CO2: OFF

After 4 weeks of vegetative growth, plants will be transferred to a bloom room for flower production. During the flowering phase, light cycles are changed and set to a 12/12 hour on/off cycle. During light-on cycles, environmental variables will be set at:

- Temperature: 74-78°F
- Humidity: 60-65%
- CO2: 1200-1500ppm

During light-off cycles, environmental variables will be set at:

- Temperature: 64-76°F
- Humidity below 45%
- CO2: OFF

Plants remain in bloom until flower maturation is complete, which is 45-83 days depending on the varietal.

While in flowering, depending on strain and overall leaf structure, plants will undergo 1-3 pruning sessions. During pruning, agents will use sanitized scissors and collect all green waste material in appropriate plant waste bags for disposal. This material is placed in bins for plant waste only. These bins
are emptied twice daily. Leaves are removed 4”-7” above soil level to promote good ventilation, thus reducing leaf density and humidity traps. This also helps during pest scouting and helps to channel the plant’s energy to the flower holding branches. Some larger “water” leaves blocking light to flower sites will be removed in the upper canopy in order to encourage more compact and vigorous flower development. Pruning sessions are another opportunity for agents to inspect plants for any possible outbreaks of pests and disease. Any problems are immediately reported and remediation measures are taken immediately.

**Cultivation Methodology**

The medical marijuana will be cultivated using Sea of Green (SOG) and Screen of Green (SCROG) methodologies, depending on the strain. We will always have the canopy trellised to provide support and help with deployment of super-cropping techniques and procedures. These methodologies will produce shorter plants with dense canopies that are easier to scout for disease and pests, and have the added benefit of shortening the duration of the vegetative cycle and overall time from propagation to finished product. This allows BrightStar BioMedics to more quickly respond to patient/market demands for specific strains while always maintaining an inventory of fresh medicine.

Using SOG and SCROG methods, harvest yield per square foot of cultivated area is comparable to that of methodologies employing longer vegetative cycles. Since life cycles are shorter, the number of harvests per year increases. Also, cultivation operations are simplified since smaller plants are easier to harvest and process. The daily and periodic maintenance routines (e.g., removal of dead leaves, scouting, FIM, pruning, etc.) is easier and more effective since staff do not have to bend over to reach the base of the plant or stretch their arms to reach the canopy. BrightStar BioMedics will perform visual inspections of growing plants and harvested plant material to ensure there is no visible mold, mildew, pests, rot, or grey or black plant material that is greater than an acceptable level as determined by the Department.

**Growing Mediums and Hydroponics**

BrightStar BioMedics will use coco coir as our growing medium. Unlike peat moss, coco may be used in re-circulating applications. Our fertigation system is a drain-to-waste (though we recapture, treat and reuse wastewater), with 4 drippers per 3-gallon Smart Pot. Mature plants will be fed 4 times daily for short intervals to produce minimum runoff.

As a growing medium, coco brings together the best properties of several growing mediums. It is a renewable resource that fits very well in our systemic approach of minimum environmental impact. Made from the fibrous husk of the coconut, coco combines the performance traits of a hydroponic medium with the forgiving properties of soil, making it the best option for medical marijuana cultivation.

Coco has a natural 70-30 moisture-to-aeration level, which makes over-watering plants almost impossible, as water will run off but aeration will remain constant once coco reaches its saturation point.
Coco has more surface area than most mediums and retains moisture without trapping water. Since it is an inert medium containing virtually no nutrients, it can be watered daily with nutrient solution, delivering a fresh supply of fuel to plant roots to accelerate growth. This is impossible with soil-like mixes, since overwatering will restrict the amount of oxygen available to the roots, suffocating them and slowing plant growth if watered daily.

While a number of manufacturers have developed coco-specific nutrients that are uniquely adapted to meet the nutritional needs of coco-grown plants, coco is also suited for growers using organic nutrients that would not be suitable for most hydroponic systems. Coco also outperforms other hydroponic mediums in creating the perfect environment for beneficial bacteria to colonize the root zone, helping plants absorb nutrients and ward off disease, while better protecting the root zone from heat than most hydroponic mediums.

Although coco has good Cation Exchange Capacity (CEC), some nutrients specifically formulated for coco tend to have elevated levels of calcium and magnesium while having lower levels of nitrogen. The CEC of coir fiber also helps reduce the incidence of salt burns, as it offers some buffering against positively charged ions such as sodium.

**Nutrient Practice**

BrightStar BioMedics firmly believes that a healthy rhizosphere teeming with microbes is the best way to achieve optimum plant growth for medical marijuana. The diversity of microbe species colonizing the root zone is enormous. The symbiotic relationship among these microorganisms and the plants is often referred to as the second genome of the plant and is paramount to plant health.

Recent research has revealed that plants are able to shape their rhizosphere microbiome, and this is confirmed by the fact that different plant species host specific microbial communities when grown on the same soil. Experiments have shown that upon pathogen or insect attack, plants can call upon specific protective microorganisms, and enhance microbial activity to suppress the attack. The mechanisms that guide this selection and trigger the activity of microbial communities in the rhizosphere are still not fully understood. However, this topic has become the subject of the research as it provides new opportunities to increase quality and yields of crops while decreasing the use of synthetic nutrients and pesticides. This is another way in which our sustainable systemic approach to growing will minimize our impact on the environment.

Our feeding regimen will include nutrients and additives from different suppliers, but the bulk of our products will come from the Nectar for the Gods nutrient line. We favor these products because of their consistent quality, the processes involved in their manufacturing, the materials they are derived from, and the fact that it is a calcium-based nutrient line. Most products in this line are essentially different forms of compost teas, which are biologically (enzymatically) digested. Since microbes have done most of the hard work by predigesting, a more natural and organic form of the nutrients is provided to the plants,
improving nutrient uptake. In essence, the plants are fed bottled microbial activity that is immediately available to the plant. This facilitates the work of microorganisms that we will inoculate in our coco growing medium as well.

Plants will be fed on a set schedule with varying nutrients, and proportions thereof, introduced over time as plant needs change during the vegetation and flowering phases. Schedules will be customized to accommodate the strains being grown. BrightStar BioMedics will maintain a log of all actions taken to our plants, including feeds. Furthermore, we will:

- Use appropriate nutrient practices
- Use a fertilizer or hydroponic solution of a type, formulation and at a rate to support healthy growth of plants
- Maintain records of the type and amounts of fertilizer and any growth additives used

We will not add any additional active ingredients or materials to medical marijuana that alters the color, appearance, smell, taste, effect or weight of the medical marijuana unless we have first obtained the prior written approval of the Department.

**Harvesting and Processing**

Harvesting will commence at the end of a dark cycle and beginning of a light cycle at the determined peak of terpene content in a crop of flowering plants. Pre-harvest protocols include removal of all fan leaves and flushing plants the last 7-10 days, depending on strains, prior to the anticipated harvest date and monitoring trichome development. Trichomes are the resin glands of the marijuana plant which contain THC, CBD and other active medicinal cannabinoids. Agents will examine flowers under 40X magnification to assess trichome gland maturity and determine the proper harvest date.

Upon harvest, trellises will be removed and plants will be cut down at the base of the stem with sanitized pruning shears and immediately weighed inside the room using an ISO certified hanging scale. All data generated, including individual plant weight, harvest date, total plant wet weight, batch identifier, number of harvested plants, and general crop notes will be recorded in MJ Freeway. Harvested plants will be transported to the trim room using pre-sanitized stainless steel carts by agents wearing gloves and hair nets, if needed. Plants of the same strain harvested in the same room at the same time will be treated for tracking purposes as a single “batch.”

**Trimming**

Upon arrival at the trim room, properly dressed agents will remove the flowers from all branches. Using an ISO calibrated and certified scale, branches are weighed (and entered into MJ Freeway) and subsequently placed in bags and discarded. The segregated flowers are also weighed with the information recorded in MJ Freeway. Agents must reconcile the weight of the batch (branches + flower) with total
aggregated weight recorded upon harvest. Our facility will be equipped surveillance cameras that will always document the movement of harvested plants. Footage will be reviewed if any discrepancies are noted.

BrightStar BioMedics will only process the parts of the medical marijuana plant that:

- Are free of seeds and stems
- Are free of dirt, sand, debris or other foreign matter
- Contain a level of mold, rot or other fungus or bacterial diseases acceptable to the Department

Flowers will be hand trimmed by trimmer agents wearing gloves, hairnets and dust face masks. All work surfaces in the trim room are stainless steel, food grade (NSF approved) and will be properly sanitized with acetic acid or Green Cleaner prior to arrival of the plants. Sanitation procedures are repeated through the workday and at end-of-day. Trimming shears must be new or must have been kept submersed in a jar containing isopropyl alcohol.

BrightStar BioMedics will ensure a sufficient number of trimmers are on staff to finish each batch within 24 hours of any harvest. This facilitates uniform batch drying and curing within the batch. Once a batch has been trimmed, its aggregate weight and the total weight of the trimmed material (leaf + stems) are entered into MJ Freeway. The sum of the two (flower + trimmed material) is reconciled with the pre-trim flower weight. Small discrepancies are accepted but major discrepancies will lead to an investigation and review of recorded footage to uncover the cause of the discrepancy. Trimmed leaves and stems are saved for extraction and taken to a freezer to be preserved. We may choose to dry freeze our trim by-product in a process known as lyophilization or cryodesiccation, which involves the freezing of by-product and then subliming the ice in a high vacuum.

Trimmers’ personal hygiene is integral to the integrity our process. They must shower and change into clean uniforms before starting work, finger nails must be kept short, hair nets must be worn at all times and facial hair must be kept to a minimum to avoid contamination by foreign particles. Trimmed flowers are collected in stainless steel containers kept by each trimmer. Agents will change trim scissors as they become soiled by flower resin. Dirty scissors are placed jars filled with isopropyl alcohol and will be wiped clean with paper towel before being reused.

**Drying**

Once the final wet weight has been recorded, staff will transfer trimmed flowers to the drying room for controlled-rate dehydration which triggers proper cannabinoid maturation and product stabilization. This room is equipped with wall-mounted fans ensuring proper air circulation during the drying process. Trimmed flowers are carefully placed onto drying racks with agents making sure only one layer of trimmed flowers is loaded onto each level of the drying racks.
Our drying room will be climate-controlled using:

- Closed-loop HVAC system equipped with Merv 16+ HEPA filters
- Humidifiers and dehumidifiers to maintain humidity within the desired range
- iPonic 624 controller to manage atmospheric settings

Temperature will be maintained below 64°F at all times to optimally stabilize cannabinoid and terpene chemical structure. Humidity will be initially set at 40% when a fresh batch first begins drying to quickly dehydrate and preserve the flowers and will be slowly increased over the course of the next 13-15 days. The goal is to have the flowers lose 75% of their moisture in the first 48 hours. These environmental settings will prevent the growth of any bacterial or fungal microorganisms that could potentially be present on the flower tissue.

Once properly dried, flowers will be carefully placed into curing containers and transferred to the curing room. After transfer, the drying room will be completely sanitized before receiving a new batch of flowers.

**Curing**

The goal of the curing process is to slowly manipulate the remaining moisture content of the medical marijuana over a period of 4-6 weeks in a highly-controlled environment. By properly curing the plant, the chance of mold developing is virtually eliminated and the resulting final product expresses the full potential of the cannabinoid and terpene profile of the strain. Curing also ensures that virtually all THC is converted from its acidic form, maximizing the potency of each genetic variety.

The temperature within the curing room will be set to 60-70°F. Keeping a narrow window of ambient temperature within the curing room allows for more consistent relative humidity inside the curing containers, reducing potential Mycotoxin/mold contamination. This room will also have a dedicated iPonic 624 controller that will automatically control environmental variables, including activating the HVAC system to regulate temperature as needed. Relative humidity within the curing room will be set to 50-60% to create the ideal environment for the curing process.

As relative humidity within the curing containers fluctuates, agents will open, or “burp,” containers for 2-4 hours to maintain 59-62% humidity. This humidity range will lead to the highest quality finished product. For the first 2-3 weeks of curing, containers will be burped daily to inspect the flowers and document the relative humidity. This also allows the air within the containers to exchange and gases to be released. During the final weeks, containers will be burped 2-3 times weekly instead of on a daily basis.
The flower product is considered cured when moisture level is 12-16%. At the conclusion of the 4-6 week curing period, the moisture content of the flowers will not exceed 16% and the product will be packaged and transferred to storage in the vault room pending independent laboratory testing for cannabinoids and purity prior to use in the extraction and infusion process.

**Water Supply**

The quality of the water used to feed our plants is paramount to our success. Water quality will be constantly monitored to ensure that it meets the standards required by our process. BrightStar BioMedics will ensure our facility is provided with a water supply sufficient for operations, which will be derived from a public water system source, or a nonpublic system that capable of providing a safe, potable and adequate supply of water to meet the operational needs of the facility. If from a public supply, water will be tested weekly for microbial contamination (before and after being filtration) to remove chemical compounds added at the water treatment plant. If the water supply is from a private well, it will be regularly tested for microbial contaminants and tested at least four times a year to identify ion presence and concentration.

Our water supply system will include reserve tanks to guarantee uninterrupted operations for at least 4 days in case of contamination or interruption of the supply for any reason. We will treat water prior to fertigation using a reverse osmosis (R/O) water filtration system. The water treatment area will be well insulated, with temperatures maintained between 64-70°F.

To ensure desirable levels of dissolved oxygen in our water, we will use aerators. Maintaining ideal concentrations of dissolved oxygen is important for overall plant health but especially for root zone health. When properly delivered to the root zone, high dissolved oxygen levels can drastically increase a plant’s ability to utilize nutrients, defend itself from pathogens, and increase crop yields.

Our R/O system will filter water to 10 ppm or less. We will routinely test our water to ensure complete removal of chlorine and chloramine. The R/O system will be properly maintained and pre-filters and membranes will be replaced according to the manufacturer’s recommendations. In addition to in-house monitoring, BrightStar BioMedics will periodically send samples of our water, before and after filtration, to a third party approved lab to confirm our findings.

Our nutrient solutions are prepared only with filtered R/O water in properly sanitized containers. We will utilize a completely automated fertigation drip-to-waste system to deliver our nutrient rich solution to the plants grown in our facility. We will deliver nutrients in a slow and methodical rate to minimize runoff. All runoff will be collected, recirculated to the water treatment area and filtered for reuse.

We will keep all equipment in the water treatment area sterile in order to prevent waterborne contamination. We will also use an Ultraviolet Liquid Storage Sanitizer in our storage tanks to disinfect
the air space and surfaces above the liquid and the liquid contents. This system irradiates the contents of the tanks with germicidal ultraviolet rays without the use of heat or chemicals using a Germicidal UV Lamp rated for 10,000 hours of effective life.

All components of our irrigation equipment (e.g., drip emitters, irrigation lines, pumps, etc.) will be cleaned weekly using acetic acid solution (vinegar solution) or Green Cleaner. We will monitor and maintain records of the pH, EC, ppm, temperature and dissolved oxygen in our water and nutrient solutions. Our in-house lab will collect samples of our water and nutrient solution for examination under a microscope to monitor potential microbial contaminants.

After use, all testing probes must be washed and returned to their original storage containers that are filled with the proper storage solution. All tools used must be sanitized before and after use. During prolonged use of equipment or use in different solutions, agents are required to re-sanitize equipment to prevent cross-contamination between reservoirs, nutrient containers and irrigation equipment. Anyone entering the area must go through the footbath and air curtain installed at the entrance, and upon entering they are required to wash their hands with warm water and soap. This procedure is repeated when leaving the area. Agents must always wear the proper safety equipment when performing their tasks (e.g., gloves, eye-protection, respirator, splash guards). Post-use, safety gear is sanitized and properly stored. Safety gear will be properly disposed periodically to ensure the integrity of our facility.

**Sanitary Practices**

All rooms that house plant materials will be equipped with a foot bath and air curtain at the access-controlled door. Wipes will also be available at each door for agents to clean their hands and forearms. Employees are required to sanitize on their way in and out of any rooms containing plants or products. Each room in our facility has operational sanitation protocols, including beginning and end-of-day procedures and weekly sanitation measures which are written on notices posted throughout the rooms and at the entrance.

Routine cultivation room cleaning and sanitizing procedures include:

- Floors swept daily and mopped with 10% bleach solution weekly
- Grow tables cleaned of debris daily and wiped with weak acid solution or Green Cleaner weekly
- Door entry mechanisms and other high contact surfaces sanitized with weak acid solution or Green Cleaner daily
- Dehumidifier filters checked and cleaned weekly
- Irrigation lines are checked for leaks, clogs, or salt accumulation daily
- Agents must use the sanitary foot bath upon entering and leaving a grow room
Outside of the grow rooms, BrightStar BioMedics will keep replacements tools and equipment used to perform daily duties (e.g., scissors, gloves, dust mask, sanitizers, paper towel, and other basic tools) on stainless steel carts to minimize unnecessary traffic through entry doors and hallways in the facility, thus reducing the potential for cross-contamination.

Section 18 – Nutrient and Additive Practices

A. Nutrient and Growth Additive Practices

By checking “Yes” to any statement, you affirm that your facility will maintain the following medical marijuana nutrient and growth processes:

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.

- Appropriate nutrient practices will be used.
  - Yes
  - No

- A fertilizer or hydroponic solution must be of a type, formulation and at a rate to support the healthy growth of plants.
  - Yes
  - No

- Records of the type and amounts of fertilizer and any growth additives used will be maintained.
  - Yes
  - No

- No additional active ingredients or materials will be added to the medical marijuana that alters the color, appearance, smell, taste, effect or weight of the medical marijuana, unless the grower/processor has first obtained the prior written approval of the Department.
  - Yes
  - No

- Excipients will be pharmaceutical grade, unless otherwise approved by the Department.
  - Yes
  - No

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

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

B. PLEASE PROVIDE DETAILS OF ALL NUTRIENT AND GROWTH ADDITIVES THAT WILL BE UTILIZED AT YOUR FACILITY:
**Nutrients and Growth Additives**

BrightStar BioMedics firmly believes that a healthy rhizosphere teeming with microbes is the best way to achieve optimum plant growth for medical marijuana. The diversity of microbe species colonizing the root zone is enormous, in the order of tens of thousands of species. The symbiotic relationship among these microorganisms and the plants is often referred to as the second genome of the plant and is paramount to plant health.

Recent research has revealed that plants are able to shape their rhizosphere microbiome, and this is confirmed by the fact that different plant species host specific microbial communities when grown on the same soil. Experiments have shown that upon pathogen or insect attack, plants are able to call upon specific protective microorganisms, and enhance microbial activity to suppress the attack. The mechanisms that guide this selection and trigger the activity of microbial communities in the rhizosphere are still not fully understood. However, this topic has become the subject of the research of many scientists as it provides new opportunities to increase quality and yields of crops while decreasing the use of synthetic nutrients and pesticides. This is another way in which our sustainable systemic approach to growing will minimize our impact on the environment.

Our feeding regimen will include nutrients and additives from different suppliers, but the bulk of our products will come from the Nectar for the Gods nutrient line. We favor these products because of their consistent quality, the processes involved in their manufacturing, the materials they are derived from, and the fact that it is a calcium-based nutrient line.

Nectar for the Gods’ manufacturing processes involve the digestion of all the nutrients with organic acids and enzymes. These digestive processes make organic meals such as feathers, bone, alfalfa, soybean and fish bone, among many others, into immediately available nutrients for our plants. Organic products that are not pre-digested need to be digested by microbial activity in the medium prior to nutrients becoming available to the plants themselves, a process that usually takes weeks. The pre-digested nutrients in Nectar for the Gods are also infused with beneficial microbes. After the digestion process is completed and the product is ready to be bottled, the pH is dropped to slow down and stabilize the metabolism of the microbes, increasing the shelf-life of the product. Organic acids like Fulvic acids, Humic acids, citric acid and carbolic acid are used in this process instead of salts which could lead to nutrient locks or deficiencies.

Below is a list of the nutrients and additives that will be fed to BrightStar BioMedics’ medical marijuana plants.

- **Medusa’s Magic**: This is a blend of proteins and enzymes gently extracted from source materials and then suspended in a worm casting tea. The source of the nitrogen in Medusa’s Magic is a protein, as opposed to mined minerals or other inorganic sources.

- **Gaia Mania**: This is derived from a blend of organic materials, enzymatically processed to extract only proteins and humates. This digestion process is the initial step in the absorption of vitamins, organic acids, and minerals by the plant. The nutrients in
Gaia Mania are readily available to the plants and the product also helps boost microbial populations in the medium, increasing protection to plants’ root systems. All of the nitrogen in this product is protein-based, arguably the healthiest form of nitrogen for plants, promoting strong, healthy growth without a tendency toward elongation, as with sodium-based nitrates. It is our belief that medical marijuana plants grow healthiest when they are grown with proteins, organic acids, and calcium-based products.

- **Athena’s Aminas**: This provides a readily available source of L-amino acid to help optimize protein production and improve growth rates.
- **Demeter’s Destiny**: This is calcium-delivered magnesium which corrects and prevents deficiencies. This special blend of various calcium sources offers microbes and root systems balanced forms of calcium and magnesium. Calcium is arguably the most important component in cellular nutrition for microbes, plants, animals and humans. It is also a growth stimulant actively involved in the promotion of cell division in growing plants, root tips and developing fruit, aiding enzymatic action, feeding soil microbes, improving nutrient availability and cell wall integrity.
- **The Kraken**: This contains digested crab and shrimp shells, an available form of chitin. Chitin has been recognized as a general elicitor of plant defense responses.
- **Mega Morpheus**: This is a fully digested source of readily available natural phosphate and a guano tea that has all foreign particles, such as sand and grit, filtered out. The nutrients in Mega Morpheus are made immediately available through digestion and chelation, increasing nutrient delivery and uptake.
- **Zeus Juice**: This is the catalyst in the nutrient line and is an essential part of nutrient absorption without a microbial field. Compounds in Zeus Juice are 100% water soluble and are absorbed immediately, acting as a catalyst to produce accelerated growth and nutrient uptake. This product contains kelp extract and we will use it to soak our seeds before germination. It also provides nutrients for the first stages of life.
- **Herculean Harvest**: This increases the availability of calcium and phosphorus to the plants and soil, producing a wide range of benefits to plant health, structure and flavor, contributing to a vigorous soil food web and improving accessibility of nutrients. The active ingredient in bone meal, calcium phosphate, helps to carry all nutrients to the plant, except for nitrogen and potassium. Calcium is essential for supplying plant growth energy in order to sustain life and growth, and promotes solid stems through stronger cell development. Calcium also increases the cation exchange capacity of our medium, making nutrients more available to microbial activity and ultimately to the plant. It also aids in washing salt from soil-like media or soilless media, and we will use it as part of our soil flush solution.
- **Aphrodite’s Extraction**: This is made of a blend of sucrose, glucose and phosphate to sustain a healthy and strong microbial population, and therefore supports healthy plant growth. Besides calcium, microbes need carbon in order to manufacture complex proteins for their growth and reproduction; low carbon equates to low microbial activity. Carbohydrates are excellent sources of carbon for microbes, especially when
blended with proteins.

- **Hygeia’s Hydration:** This contains yucca extracts that are rich in saponins and acts as a wetting agent to aid in root penetration, improving nutrient uptake. The organic acids in yucca contribute to chelation of other nutrients, making them more available to microbes and to our plants. We will use it as a wetting agent for foliar feeding nutrients and, if needed, pest and fungal control sprays. We will reduce aeration in our reservoirs when using this product to avoid the foaming of the saponins.

- **Poseidonzyme:** This is a liquefied seaweed product rich in organic acids and over 60 naturally occurring major and minor nutrients and amino acids. Kelp is a good natural source of potassium and cytokinins, which promote cell division in root and plant growth and affects apical dominance, axillary bud growth, and leaf senescence (biological aging). This product is a natural chelator and helps release previously unavailable nutrients and other substances in the soil for plants to use. It also helps to increase the plant’s natural ability to fight pests and disease by boosting the immune system.

- **Bloom Khaos:** This will be used to aid in flower production. When used as a foliar feed, it increases the flower sites, and helps to produce larger, denser flowers, of superior color, flavor and aroma. Bloom Khaos contains humic acids and kelp and improves plant tolerance to stress at crucial times of the plant’s life cycle, such as transplanting, flower transition and prior to taking cuttings.

- **Hades Down:** From our experience, it is imperative to maintain pH between 6.2-6.8 to obtain the best results with the Nectar for the Gods nutrient line. This product is a pH adjusting liquid used to lower the pH of our nutrient solution. Hades Down chelates elements in the nutrient solution into stable, slow releasing forms which are easier for plants to absorb. Providing readily absorbed natural molecules, Hades Down has the ability to stimulate microorganisms and plant growth.

- **Olympus Up:** This is the Nectar for the Gods pH “up” product. It uses liquid calcium as a pH adjusting component, making more calcium available to our plants’ cell structure, promoting cell wall integrity. Residual Olympus Up in the soil will increase aeration and promote microbial activity by offering a food source for the soil microorganisms while improving nutrient delivery.

- **SOS (Super Organic Stimulator):** This is a blend of 19 species of naturally occurring beneficial bacteria. These specifically chosen microbes promote stronger and faster root, stalk, flower and fruit development. It will also help in breaking down salts into bio-available nutrients, remediate toxins present in the medium and speed the breakdown of dead organic material into bioavailable nutrients.

- **Great White:** This contains 15 different species of mycorrhizal fungi, 19 different species of beneficial bacteria, 2 species of trichoderma, plant vitamins and glycine all in a single product. This product will improve plant and root growth, helping plants improve efficiencies of their processes. It increases water uptake and the overall absorption area of the root system, resulting in a healthier plant.

- **B-52:** This product contains B vitamins that are essential for plant health. Plants make
their own B vitamins but by providing pre-made vitamins, we will alleviate some of the synthesis work of our plants allowing them to use nutrients for growth and flower production. B-52 contains Vitamin B1 (Thiamine), Vitamin B2 (Riboflavin), Vitamin B3 (Niacin) and Vitamin B7 (Biotin).

Section 19 – Processing and Extraction

Please describe the technologies, methods, and types of equipment you will employ to extract the critical compounds from medical marijuana plants to produce the medical marijuana and medical marijuana products, and the types of medical marijuana products that will be produced:

Overview

BrightStar BioMedics has established standard operating procedures (SOPs) for medical marijuana processing, extraction, and infusion, which are in compliance with all applicable laws, rules and regulations, including 28 PA Code §1151. Our proven SOPs have been adopted and amended from medical marijuana grower/processor affiliates including Rosebud Organics of Maryland; Holistic Industries of Massachusetts; and Holistic Remedies and Organic Wellness of Washington DC.

BrightStar BioMedics processing and extraction program will be designed and managed by Dr. Adam Kavalier who has over 15 years of experience in extraction chemistry. Dr. Kavalier has extensive experience working with cannabis extraction and has lead the building and management of laboratories in three other medical marijuana programs The extractions will take place in areas of our facility specifically dedicated to processing activities, which will be clearly marked with proper signage. Upon request, these areas will be made accessible to the Pennsylvania Department of Health (the Department) and its authorized agents and/or by law enforcement.

All processing and extraction areas will be equipped commercial-grade systems to monitor, record, and regulate:

- Temperature
- Humidity
- Ventilation
- Lighting
- Water supply

Generally, within the first 6 months after the Pennsylvania Department of Health (the Department) determines BrightStar BioMedics to be operational, we will
provide the Department with a forecast of the amount of medical marijuana we project to produce and in what form. Thereafter, we will notify the Department in writing immediately upon becoming aware of a potential increase or decrease in the forecasted volume occurring within any subsequent 6-month period.

BrightStar BioMedics will ensure that all finished products in the form intended to be sold to another medical marijuana organization, will have third party certified laboratory results quantifying the following cannabinoids which will be reported to the Department and printed on the product label:

- Tetrahydrocannabinol (THC)
- Tetrahydrocannabinolic acid (THCA)
- Tetrahydrocannabivarin (THCV)
- Cannabidiol (CBD)
- Cannabidiolic acid (CBDA)
- Cannabidivarin (CBDV)
- Cannabinol (CBN)
- Cannabigerol (CBG)
- Cannabichromene (CBC)
- All additional cannabinoid components present at > 0.1%

**Extraction Technologies and Methods**

BrightStar BioMedics will manufacture cannabis medicine using state of the art extraction machinery and methodologies including supercritical fluid extraction (SFE), steam distillation, molecular distillation and broad-spectrum ethanol extraction. Dr. Kavalier, who will lead the program, has several years of experience in the application of SFE as well as extraction and isolation chemistry specifically geared towards plant chemistry.

Supercritical Fluid Extraction technology (SFE) utilizes carbon dioxide (CO₂) to produce solvent free extracts for the food and pharmaceutical industries. Carbon dioxide is a favorable medium for extraction because it is non-toxic and environmentally friendly. Common extraction methods in the cannabis industry use flammable hydrocarbons, which raise concerns over health and safety of both the patients and manufacturers. With the advancement of recent technology in SFE, CO₂ extraction has become the safest and most effective technique to extract medicinal compounds from cannabis.

In our SFE system, CO₂ is placed under pressure at specific temperatures so that it is altered into a physical state between that of a gas and a liquid. In this intermediate phase between gas and liquid CO₂ is very effective at extracting mid-molecular weight terpenes and cannabinoids from cannabis. Medicinal cannabinoids and terpenes are stored in glandular trichomes produced on the flowers and leaves of the plant. Supercritical CO₂ has the ability to rupture the cellular walls of these trichomes and dissolve the cannabinoids and terpenes contained within. Once cannabinoids and terpenes are dissolved in supercritical CO₂ they are released into a collection vessel where the pressure and temperature drop and the extract is deposited. The
CO₂ gas evaporates and purified cannabinoids and terpenes are collected.

In addition to SFE CO₂ extraction we use steam distillation to extract small molecular weight monoterpenes. Monoterpenes are extremely volatile and subject to loss during the curing, drying, and extraction of cannabis. Much of the cannabis medicine on the market highlights cannabinoids and overlooks these small molecular weight mono-terpenes, however, these compounds have tremendous medicinal activity. Monoterpenes have anti-inflammatory, analgesic, anti-cancer, anti-depressive and anti-fungal activity among others. Therefore we put a focus on preserving these molecules in our medicine.

In steam distillation water is heated and the steam passes through raw cannabis material. Low molecular weight terpenes (monoterpenes) are carried by the pressure of the steam into a condensing trap where they are captured alongside the condensing water. Terpenes are then separated from the water using a separatory funnel. These small molecule terpenes are labile and can be destroyed during SFE so in order to preserve them we conduct steam distillation prior to SFE.

SFE yields cannabis oil rich in cannabinoids, sesquiterpenoids and diterpenoids. While the smaller molecular weight monoterpenoids are normally lost during this extraction process, we preserve them through our steam distillation method. SFE yields a high quality medicine full of mid-molecular weight terpenes and cannabinoids, for additional separation and purification we use molecular distillation techniques.

We further separate SFE oil into purified terpene and cannabinoid fractions using molecular distillation. CO₂ oil is a high quality medicine as is, but for more specialized medicines we will conduct molecular distillation to isolate these fractions. This technology makes use of the vaporization point of sesquiterpenes and cannabinoids to aid in their isolation. Once lightly vaporized, sesquiterpene or cannabinoid vapors pass through a condensing coil where they are separated from any remaining plant molecules such as chlorophyll and other plant pigments, which are present in CO₂ oil. The condenser is connected to a collection vessel where the purified fractions are collected. This technique yields 95-99% pure sesquiterpene and cannabinoid fractions.

Through a combination of steam distillation, SFE and molecular distillation we separate three main molecular fractions: monoterpenes, sesquiterpenes and diterpenes, and cannabinoids. We then manufacture medicines by recombining these fractions in ratios specific to a medical purpose. These medicines are both highly pure and broad spectrum due to the great diversity of the chemical profile of each fraction combined. Manufacturing cannabis medicine in this way allows us to taylor each medicine to treat a specific ailment.

Additionally, we will offer broad-spectrum whole plant extracts within our medicinal product line. Using subzero ethanol we submerge whole flower and trim over five days to extract cannabinoids in addition to terpenes, flavonoids and alkaloids. Following extraction the tincture is pressed to remove all plant material, then quantified for total cannabinoid and terpene content. This broad-spectrum medicine is sold as a tincture for sublingual delivery.
Our proposed integrated operations, with cultivation connected to processing, allow us to further tailor the chemical makeup of our products. We have a breeding program designed to produce genotypes with diverse chemical makeups. While there are over 80 bioactive cannabinoids in cannabis only few are understood. Some of these lesser-known cannabinoids, such as cannabichromine, cannabigerol and tetrahydrocannabivarin have shown strong bioactivity and medical efficacy in treating chronic pain, cancer, anxiety and depression. By making medicines that capitalize on these diverse groups of medicinal compounds we will be able to help lead the industry to discover more effective treatments using cannabis.

**Extraction Equipment**

**Supercritical Fluid Extraction**

There are a number of reputable manufacturers of SFE equipment in the U.S. The most well known are Waters, Eden Labs and Apeks. BrightStar BioMedics intends to use the Apeks 5000 PSI 40LX40LD SYSTEM in our extraction laboratory because of its level of versatility and large capacity.

The 5000 PSI operating pressure of this equipment allows for short extraction times, with efficient extraction of medical marijuana oils without thermal degradation. This equipment operates at low temperatures which aids in the preservation of sesquiterpenes and other medicinal compounds such as flavonoids.

Important features of this system include:

- The ability to process approximately 80-100 pounds of dried, ground medical marijuana in a 24-hour period
- Full automation with touch screen control for easy input of extraction parameters
- High yields per hour
- Designed for high-volume production environments
- Enhanced versatility; easy switching from subcritical to supercritical runs and vice-versa
- Equipped with dual-phase pumping system (liquid and gas). The liquid pump allows for high CO2 flows at higher pressures and the diaphragm compressor technology gas pump for energy efficiency and cold separation
- Multiple 3-phase power options
- Valve-less Expansion Technology
- Widest supercritical range allowing operating pressures of up to 5000 Psi
- UL Listed

**Short Path Wiped Film Distillation**

Roots Sciences is a manufacturer of state of the art short path wiped film distillation units. Wiped film distillation is the method of molecular distillation we use to make highly pure cannabinoid and sesquiterpenoid fractions. The Roots Sciences VKL 70-5 wiped film
distillation unit is a cutting edge instrument that processes 1.5L of oil/hr and uses temperatures and vacuum settings to avoid degradation of labile compounds. The machines are fully heat jacketed with precise temperature regulation and a very high vacuum pressure. The high level of vacuum facilitates distillation at lower temperatures and therefore avoids degradation of the compounds of interest. Root sciences has manufactured this machine to create a high evaporation rate and short resonance time of less than 10 seconds. Residence time is a measurement of the amount of time that vaporized molecules spend in gas phase. During residence the molecules are in a state susceptible to oxidation and degradation. With a 10 second residence time the cannabinoids separated in the VKL 70-5 are susceptible to oxidation and degradation for a very short period of time. The combination of a high vacuum and short vapor path keep resonance time down while maintaining a high throughput making this machine the best distillation unit on the market.

Steam Distillation
Our steam distillation unit is comprised of a glass apparatus which includes a round bottom heating flask, heating element, laboratory glassware, a condenser and a collection vessel. It is a relatively simple setup but tremendously useful to collect medicinal mono-terpene fractions.

Post-extraction processing
SFE requires very little post-extraction processing in comparison with other extraction methods. SFE however does extract waxes and fats in addition to cannabinoids and mid-molecular weight terpenes. To remove fats and waxes CO₂ oil can undergo a winterization step. Winterization is the process of precipitating and filtering fats and waxes from crude CO₂ oil. Fats and waxes naturally precipitate from cannabis oil when exposed to subzero ethanol. To winterize, CO₂ oil is dissolved in ethanol and placed at -20°C for 24hrs. During this time the fats and waxes precipitate. While remaining cold, the solution can be vacuum filtered to separate the fats and waxes. The remaining ethanol solution is then evaporated using a rotoevaporator distiller. Rotoevaporator distillers remove solvents from the compounds of interest in a way that allows that solvents to be recycled.

Decarboxylation
Phytocannabinoids are present in cannabis in an acidic form, which are not readily absorbed. In order to increase bioavailability and activate these compounds a step of decarboxylation is required. Decarboxylation is a chemical process that releases CO₂ from the acidic form of cannabinoids to yield a neutral state. This reaction occurs by exposure to heat, there are specialized ovens that facilitate this process.

Decarboxylation Equipment
Cascade Botanicals manufactures a state of the art drying oven specifically for cannabis decarboxylation. The Cascade Botanicals Drying Oven Model CDO-28 has a capacity of 28 cubic feet and is able to accommodate roughly 50 pounds of plant material per run, making it ideal for large scale commercial operations and a good match for the Apeks 5000 extraction system. Features include:

- Temperature rated, large capacity mesh bags for easy loading ground medical
marijuana plant material
• Humidity sensor displays relative humidity/moisture levels during process
• Fast heat-up: 24 minutes to 300°F/uniformity: +/- 3.5°F
• Easy timer for automatic operation
• TUV certified, CSA and CE approved

Decarboxylation Process
Maximum decarboxylation occurs when plant material is heated to 245°F for 45 minutes. The CDO-28 has very accurate temperature control and strong air circulation which aids in both water evaporation and efficient decarboxylation.

Medical Marijuana Products

BrightStar BioMedics expects to manufacture and sell a wide assortment of medical marijuana products using a variety of proprietary extraction and infusion techniques in strict compliance with Pennsylvania law and regulations. To facilitate a variety of routes of administration used by patients (including specialized products to treat children), we will specifically produce a sufficient assortment of products types and forms manufactured using a range of medical marijuana varietals to achieve the desired medicinal effects. Generally, product types will include those which can be vaporized, nebulized, inhaled, ingested through the stomach, taken sublingually, and topically applied. We will take all appropriate measures to ensure patients have sufficient options of available cannabinoid profiles and routes of administration to accommodate their personal medical program developed with their certifying physicians. No two patients are alike, so as a top-tier provider in the healthcare space, we are responsible to offer an appropriate spectrum of medicinal products for distribution.

BrightStar BioMedics will not add any additional active ingredients or materials to medical marijuana that alters the color, appearance, smell, taste, effect or weight of the medical marijuana unless we have first obtained the prior written approval of the Department. Excipients will be pharmaceutical grade, unless otherwise approved by the Department.

BrightStar BioMedics will only process the parts of the medical marijuana plant that:

• Are free of seeds and stems
• Are free of dirt, sand, debris or other foreign matter
• Is below the levels of mold, rot or other fungus or bacterial diseases accepted by the Department

BrightStar BioMedics medical marijuana products will be processed using the refined plant
extracts obtained from our original strains without manipulated cannabinoid separation. Our goal is to preserve the “entourage effect” (i.e., the natural synergies of the medicinal compounds as they are present in their natural state in the medical marijuana plant) as this yields the best medicinal treatment options for patients. This is also our end goal in isolating the monoterpenes and sesquiterpenes from the plant material in order to add them back to the final cannabinoid extracts and create a full spectrum medicine with the same three classes of compounds found in the original plant material. If a patient requires a formulation with specific ratios of recombined medicinal compounds, we will employ safe and effective separation methods, such as high pressure preparative chromatography (HPPC).

In general, our cannabinoid and terpene profiles are determined by our plant genetic selection. Our extracted pharmaceutical-grade oils will be distributed in this processed form (packaged appropriately for dispensation) or will be infused/combined with selected and Department-approved excipients according to each specific delivery system manufactured.

BrightStar BioMedics’ product line will at first be limited to:

- Oil
- Pills
- Topical forms, e.g., gels, creams, oils and ointments
- Tinctures
- Liquids, e.g. sublingual sprays
- Pre-filled vaporizer cartridges

The selection of these methods of delivery is aimed at giving practitioners and patients more choices to determine the best dosages and mechanisms of delivery for each patient’s individual treatment program. As BrightStar BioMedics receives feedback from certifying physicians and patients through our dispensary customers, we will periodically review and update our product offerings, always remaining in compliance with Pennsylvania law and regulations.

Oil
As noted above, the resulting extract from our extraction process is a pharmaceutical-grade medical marijuana oil that is immediately ready for patient consumption. Of course, we will further package in unit-sized containers meant for dispensation to patients and affix a compliant label before preparing the oil products for transport to a dispensary. Oil products can be administered by patients in a number of safe, effective ways including by vaporization.

Pills
Research has demonstrated that HPMC (Hydroxypropylmethyl cellulose) capsules are the best choice for encapsulating medical marijuana extracts because they provide the highest level of capsule stability for medical marijuana oil formulations.

BrightStar BioMedics also intend to offer Extended Release (Enteric-Acid Resistant) capsules. These are designed to bypass the stomach acid and only dissolve once they reach the intestine. Enteric capsules are acid resistant by design with pH sensitive polymer incorporated into the
formulation. Enteric capsules dissolve at a pH of 5.5 or higher, thus preserving many cannabinoids from being destroyed by the gastric acids. For patients who prefer a planned or extended release medicine, this type of capsule can increase bioavailability by up to 20%. Extended release capsules begin dissolving 1-2 hours after ingestion.

If approved by the Department, we intend to use coconut oil and soy lecithin as excipients in our pill products. Combined, these two compounds act as an effective metabolizing agent for the cannabinoids as they pass through the digestive system, enabling better absorption of the medicinal compounds.

Filling Equipment for Pills
Extracted oils are filled into capsules using capsule filling machines. BrightStar BioMedics intends to use a RoboCAP RL-200, manufactured by Schaefer Technologies. In this machine, a Robotic Arm automatically fills and cycles 100-300 capsules (depending on size) that are placed in a tray. Metered doses are dispensed into the capsules by adjusting the parameters of time and pressure on the machine controls. The system also has the ability to heat the medical marijuana extracted material into a less viscous and more fluid state for ease of filling the capsules. This machine has a small footprint and with one operator is capable of filling up to 1,400 capsules per hour. Schaefer Technologies offers accessories to increase the throughput to 10,000 capsules per hour with the addition of two more operators. This machine also has the versatility of different attachments and accessories and can be modified to fill vials and bottles.

Banding of Pills
BrightStar BioMedics will band capsules to avoid leakage of medical marijuana oils, especially in environments exceeding 85°F, such as if pills are left in a locked car by a patient on a warm day. Capsule banding requires a machine to apply a band around the capsule cut line (the seam where the two sections of the capsule meet). The banding solution is made of the same material as the capsule (HPMC vegetable based). After the solution is applied to the capsule it must dry in ambient conditions to properly cure.

We intend to use Schaefer’s Lab-Top Bander. With this equipment, an operator loads capsules on carrier slats that automatically move over rotating solution application wheels that apply the solution. Dual application wheels apply 2 bands for a robust seal. After banding, the slats are put on the drying rack for curing.

One operator can band 100-200 capsules per hour. Higher output can be achieved by adding additional operators and slats. Maximum output for this machine requires 4 operators and 12 slats and produces 800-1,000 capsules per hour. The machine comes with 6 slats in any capsule size combination. Notably, the banding machine will become our first bottleneck of the encapsulation operation, and therefore once we are at full operational capacity we plan on adding 4 operators and 12 slats to keep pace with the capsule filling machine.

Topicals
Medical marijuana topical product forms include gels, creams, oils and ointments which are infused with active cannabinoids and applied to the skin where they are directly absorbed.
These products offer therapeutic relief by binding to a network of cannabinoid 2 receptors (CB2 receptors). CB2 receptors are found throughout the body and are activated either by the body’s naturally occurring endocannabinoids or by phytocannabinoids found in medical marijuana. Cannabinoids in the topicals bind to CB2 receptors present in the skin, which absorb them in a way that helps cells regenerate, allowing wounds to heal faster and easing painful chronic conditions.

The topical application of cannabinoids allows them to be absorbed more directly into the affected area for faster and more targeted relief. Topicals are non-psychoactive, so they are often popular among patients who want the therapeutic effects of medical marijuana without any psychoactive effects.

**Tinctures**
Medical marijuana tinctures can be made from alcohol- glycerin- or oil- based liquids. Tinctures are the oldest form of cannabis administration and they are whole plant broad spectrum medicines containing a number of different active compounds including flavonoids, alkaloids, tannins and chlorophyll. The most efficient way to use medical marijuana tinctures are sublingually.

Sublingually administered medicines have a rapid rate of absorption, and avoid the risk of degradation from salivary enzymes and the gastrointestinal tract. Furthermore, after absorption from the gastrointestinal tract, medicinal compounds in medical marijuana are filtered through the liver, where they can be further modified before entering the blood stream. Sublingual administration is favorable in speed and precision of delivery.

Importantly, medical marijuana tinctures can be mixed with natural flavors to make them more palatable, which means this product is an ideal option for qualifying children-patients.

**Liquids**
In addition to tinctures BrightStar BioMedics will produce sublingual spray which aids in the rapid absorption of medicinal compounds. These medicines can be more effective as a spray which produces smaller particle droplets with a greater surface area and more access to vascular absorption.

**Pre-Filled Vaporizer Cartridges**
BrightStar BioMedics’ medical marijuana oils are perfect for delivery using a vaporizer pen. There is no need to add any excipients to this pharmaceutical-grade oil since in most cases it will be fluid enough for controlled dispensing with the equipment selected to fill our vaporizer cartridges (The Schaefer Technologies, RoboCAP RL-200). However, in the event that the oil produced during a run turns out to be too viscous, our processing equipment is already capable of heating the dispensed fluids to make them less viscous.

**CBD Therapy**
At BrightStar BioMedics, we place an important focus on educating the market (particularly patients) on the significance of CBD therapy. Currently over half of the plants grown by our grower/processor affiliates in Washington DC have high levels of CBD. By producing both
1:1 THC to CBD hybrid varietals, including the MediHaze and Rutherford B. Haze strains, as well as high CBD-only strains like Cannatonic LR1, ACDC, Valentine X, and Harlequin, we can support a growing number of patient’s health needs. With these genetic profiles in stock, we focus on making three novel types of CBD medications:

- CBD-only oil,
- 1:1 THC to CBD tincture
- A highly concentrated full spectrum whole plant extract commonly known as Rick Simpson Oil (RSO).

Notably, our affiliate Holistic Remedies was the first grower/processor in the Washington DC medical marijuana program to manufacture and distribute CBD medications in that market.

Our CBD oil program was developed in partnership with a local Washington, DC parent looking for a safe and dependable means to treat his son, Jackson. At just four years old, Jackson was suffering from over 50 seizures a day. Using a proprietary full-plant alcohol extraction method of one of our CBD-only strains, we compounded with MCT oil and created a medicine safe for children that has had lasting results. Jackson is now completely free of seizures. By integrating extracted products with MCT oil, we have found it easier to administer and dose our medications for children as well as adults.

Each 1 fl. oz. bottle of our proprietary product has a measured 240 mg of CBD and is currently used to treat children with epilepsy, adults with anxiety, neuropathic pain, multiple sclerosis, and cancer.

Section 20 – Sanitation and Safety

Please provide a summary of the intended sanitation and safety measures to be implemented at your proposed facility and site. These measures should cover, but are not limited to, the following: A written process for contamination prevention, pest protection procedures, medical marijuana handler restrictions, hand-washing facilities, and inspection schedules to ensure the accuracy of operational equipment.

Sanitation and Safety

BrightStar Biomedics has developed and will implement a set of written sanitation and safety standard operating procedures (SOPs) for contamination prevention, pest protection, handling of medical marijuana, hand-washing facilities and inspection schedules. BrightStar Biomedics SOPs shall comply with all applicable Commonwealth and local building code requirements. The sanitation and safety of a medical marijuana grower/processor facility is of the highest priority. The physical infrastructure, along with all policies and procedures, must be designed to prevent foreign contaminants of medical marijuana at every phase in its growth and...
production.

**Contamination Prevention and Pest Protection**

In compliance with our SOPs, BrightStar Biomedics will maintain our facility in a sanitary condition in order to limit the potential for contamination or adulteration of medical marijuana grown and processed by our team. We will ensure:

- Equipment and surfaces, including floors, counters, walls and ceilings, will be cleaned and sanitized as frequently as necessary to protect against contamination, using a sanitizing agent registered by the United States Environmental Protection Agency (EPA), in accordance with the instructions printed on the label.
- Equipment and utensils will be made of materials that can be adequately sanitized and cleaned.
- Equipment, counters and surfaces for processing must be food grade quality and may not react adversely with any solvent being used.
- Trash will be properly removed at least once daily, and more often as necessary.
- Floors, walls, and ceilings will be kept in good repair.
  - Staff will inspect the interior of the facility as part of opening procedures and will immediately report to management any issues observed or suspected.
  - Upon notification of an issue, management will immediately repair the affected floor, wall, or ceiling.
- Adequate protection against pests will be provided through the use of integrated pest management (IPM) practices and techniques that identify and manage pest problems, and the regular disposal of trash to prevent infestation.
  - Staff will regularly inspect the premises for signs of pest infestation and will immediately report to management any issues observed or suspected.
  - When and where necessary, we will install door sweeps, utilize sticky traps, and apply safe pest prevention and management products.
- Toxic cleaning compounds, sanitizing agents, solvents and pesticide chemicals will be labeled and stored in a manner that prevents contamination of medical marijuana and in a manner that otherwise complies with other applicable laws and regulations.
Prevention of Contaminants Entering the Facility

BrightStar Biomedics will monitor and control the access of people and materials entering and exiting the facility. All persons (employees, visitors, inspectors, law enforcement, etc.) entering the growing and processing areas of the facility will be required to undergo a decontamination process before entering. This process may include a high-speed air curtain, or similar decontamination procedure, and dressing in clean work clothes before gaining access to the protected areas of the facility. After pre-admission decontamination protocols have been met, only security may clear the individuals seeking access beyond the common areas of the facility.

Within the operational zones of the facility, specific safety, security and sanitation standards of operation are strictly enforced to guide employees in the proper execution of their various work tasks and product handling. Every area of the facility where plant material is kept will have a foot bath and an air curtain at the secure access entry doors. All persons entering these areas will be required to use the air curtain and foot bath each time they enter or exit these secure areas. Foot baths will be exchanged regularly to prevent them from becoming a source of contamination.

All persons entering operational rooms must use sanitizing wipes placed at the door to scrub hands and forearms. We intend to install stainless-steel food grade (NSF approved) double bowl sinks inside each room containing plant tissue. Other hand washing stations will be strategically placed in high traffic areas outside these rooms.

Staff will only have authorized access to the specific areas where they work, eliminating unnecessary employee traffic within the facility, thus reducing the likelihood of any contamination. The facility will have an intercom and internal CCTV system allowing agents to report potential problems and request assistance instantly. Employees will have access to walkie talkies, an intercom and CCTV system and a PA system for communication.

All interactions between agents and plants are recorded in our electronic tracking software and any potential source of problems must be recorded, reported and addressed before agents engage other daily duties.

Upon finding a potential problem that may cause a sanitation concern, the agent must immediately place a red magnetic triangle at the entrance door of the affected room. The triangle at the door acts as a visual notification for agents that may be coming to work on a new shift or are otherwise unaware of the triggering event. After proper recording, reporting and addressing of the problem, staff will affix a written warning notice to the room’s door explaining the event so all staff who attempt to enter the room are aware of the situation and can adjust their procedures accordingly. All information on the notice will also be documented in our recordkeeping software. Once the event has been remedied, the warning triangle and the warning notice are removed.
To further guard against contamination, all materials entering our facility undergo a specific screening process. Prior to accepting a delivery, receiving agents will confirm that the delivery is expected and the items being delivered match the order placed. After accepting the delivery, agents will separate the items from packaging materials. These packaging materials are potentially a source of contaminants and therefore will be discarded promptly outside of the facility and never allowed to enter the facility from beyond the shipping preparation area. The items delivered will be visually inspected for contaminants, tagged as pre-quarantine, entered into the inventory control system and moved into a decontamination area separate adjacent to the shipment preparation area where they undergo another visual inspection for contaminants before being cleaned with a sanitizing product. Only then will the items delivered be approved for transfer to the interior of the facility (after a final visual inspection for contaminants). These actions will be entered into our inventory control system, including the name of the agents conducting the receiving and sanitation procedures. The decontamination area (which also functions as a man-trap) will be fogged at least twice weekly to kill any pests that may have escaped detection.

New Stock Contamination Prevention Measures
New plant stock (seedlings, seeds, cuttings) will be treated in a separate area from all other plants (acting as a quarantine) with proper lighting and controls of temperature and humidity. These materials will undergo the same process of visual inspections before being accepted into this area. Quarantine for live plant material is more rigorous than for non-plant materials, with daily inspections lasting a minimum of 14 days. This area will also be fogged with a safe pesticide and fungicide approved by EPA and FDA for use with edible crops.

Water Contamination Prevention Measures
BrightStar Biomedics shall ensure that our facility is provided with a water supply sufficient for our operations, which shall be derived from a source that is a public water system, or a nonpublic system that is capable of providing a safe, potable and adequate supply of water to meet the operational needs of the facility. The water used in the facility, if from a public supply, will be tested weekly for microbial contamination, before and after being filtered, to remove the chemical compounds added at the water treatment plant. If the water supply is from a private well, it will be tested regularly for microbial contaminants and tested at least four times a year to identify ions present and their respective concentrations.

Proper security clearance is required to gain access to the water treatment area. This ensures proper sanitation protocols can be managed and also prevents potential tampering or contamination of crop fertigation solutions. Nutrients and growth additives are stored in proper chemical storage lockers accessible only to authorized staff.

Air Exchange
All the systems that exchange air with the perimeter of the facility (e.g., heating, cooling and air circulation) will have HEPA filters to prevent entry of airborne contaminants. The filters will be capable of removing 99.97% of particles with a diameter of 0.3 micrometers (µm) and will be periodically replaced as recommended by the manufacturers to minimize the potential of airborne contamination. We will use positive air pressure with proper ventilation in all rooms that contain plant tissues (dead or living) in an attempt to further prevent cross...
contamination. We will also scrub the air coming into the building with gaseous hydrogen peroxide to continue filtering air in ventilation.

Facility Cleaning and Maintenance
BrightStar Biomedics SOPs will classify used equipment into two categories in terms of cleaning procedures and protocols: 1) single-use and 2) multiple-use.

Single-use, disposable, equipment will be sorted according to whether the item is recyclable or trash. Trash will be collected in black bins while recyclable items will go into blue bins. These items will be collected in transparent garbage bags to allow visible identification of items in case it becomes necessary to locate a specific item. Some examples of single-use trash items are gloves, single-use dust masks, insect traps, twine, trellises, etc. Recyclable items may include: single-use scalpels, single-use razor blades, fogger containers, single-use equipment wrappings etc.

Multiple-use equipment has strict SOPs for post-use cleaning. Post-use cleaning procedures apply to hard plastic reusable items that are regularly employed as part of cultivation, trim and processing, and packaging activities. These items are generally cleaned by soaking or wiping/scrubbing the item with the appropriate sanitizing agent. If the equipment comes into contact with plant tissue, it is of critical importance to wipe it clean, especially upon repeated use.

Sanitizing agents include acetic acid, isopropyl alcohol, green cleaner, sap off soap, hydrogen peroxide, 10% bleach solution, etc. Working surfaces that come in contact with plant tissue will be wiped clean with alcohol. Trimming shears, pruning shears, scalpels and razor blades are wiped down with alcohol before, after and during use. Trimming shears and pruning shears when not in use are placed in a jar filled with alcohol. Scalpels and razor blades are single-use equipment and will be disposed as described.

Containers and similar equipment are scrubbed with abrasive cleanser after use and air-dried. Items used in packaging such as scales, stainless steel worktops, and weighing containers are wiped down with alcohol or acetic acid to remove plant resins. Staff work uniforms are placed in a laundry basket immediately after each employee’s shift and cleaned in hot water or steam laundry cycles on a daily basis.

All waste bins are scrubbed and pressure washed with hot water and soap at least twice weekly. Foot baths filled with a bleach solution are placed at the entrance of every room in the facility containing plant tissue with solution changed regularly. At the entrance of these rooms there will be sanitizing wipes for employees to use on their hands and forearms. Inside or near the rooms will be stainless food grade double bowl sinks to wash, clean and sanitize the equipment used in each room.

Some items, such as floors, walls, grow tables, plant containers, work surfaces and nutrient reservoirs, etc., are cleaned according to a pre-set schedule. At the end of each harvest cycle, plant pots/containers are soaked in bleach water, and then brush scrubbed before air-drying. After each harvest, grow tables, irrigation equipment, and grow room walls and floors are

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pressure washed with hot water and soap, brush scrubbed, rinsed and allowed to air dry. After every use, cloning machines are soaked in peroxide solution and brush scrubbed before air-drying. All work surfaces that contact medical marijuana are wiped or scrubbed at the end of every shift with alcohol or Green Cleaner. Nutrient reservoirs and pumps are cleaned on a weekly schedule with hot water and Green Cleaner. Once a month we may use an abrasive cleanser if needed.

**Pest Protection Procedures**

BrightStar Biomedics employs a comprehensive Integrated Pest Management (IPM) system to address pest protection procedures. This is a multilayered approach that starts on the perimeter of the facility with a buffer or exclusion zone along the building exterior, filters on every air exchange point, and UV insect light traps on ducts. IPM then provides additional layers of protection in areas closer to our plants. This systemic approach will successfully mitigate the risk of pest problems, thus reducing the need for potentially harmful pesticides.

Our IPM system is based on proactive actions focused on exclusion and prevention. Our goal is to completely eliminate the need for application of pest controls, even organic ones. In the event that application of pest controls becomes necessary, BrightStar Biomedics will use only pesticides, fungicides or herbicides that are approved by the Department of Agriculture for use on medical marijuana plants and listed in 29 PA Code §1151 Appendix A (relating to acceptable pesticide active ingredients for use) and in accordance with the Pennsylvania Pesticide Control Act of 1973 (3 P.S. §§ 111.21—112). BrightStar Biomedics will only use these pesticides, fungicides or herbicides in a manner that is approved by the Department of Agriculture on the basis of Federal law and regulations. These products are safe to use, but pests tend to develop resistance after several applications so it becomes important to change products after a few applications for effective treatment.

Should any pesticide be applied, BrightStar Biomedics will maintain a record of each application that includes:

- The date of application; for a pesticide requiring a re-entry time, the date of application must include the hour completed
- The place of application, including the specific block, section, or immature medical marijuana plants or medical marijuana plants treated
- The size of the area treated
- The product name of every pesticide used
- The EPA product registration number. This requirement is unnecessary for products exempted under section 25 of the Federal Insecticide, Fungicide, and Rodenticide Act (7 U.S.C.A. §136w)
- The total amount of every pesticide used in pounds, ounces, gallons or liters applied to a treated area
- The dosage or rate of application of every pesticide used
- If applicable, the employee identification numbers of the individuals involved in making the pesticide and the permit or certification numbers of the individuals making or supervising the application
• Copies of pesticide labels and Safety Data Sheets for the pesticides used at the facility

BrightStar Biomedics will create these records within 24 hours of the completion of the application (and likely much sooner) and these records will be maintained for at least four years. A record shall be made immediately available to the Department or its authorized agents and medical personnel or first responders in an emergency. A record shall be made available to the Department of Agriculture upon request.

Another important element of our IPM system is the introduction of procedures to proactively monitor plant health. This will include the random collection of leaf material from our plants to monitor Brix levels. These tests are easy to conduct and can be done in-house using a refractometer. This will allow us to predict a crop’s pest pressure, yield potential, quality, and status of important minerals such as calcium and other stressors. The goal behind monitoring Brix levels is to detect the presence of stress factors before the marijuana plant becomes symptomatic.

**Integrated Pest Management Principles**

Our IPM is founded on three principles: 1) prevention, 2) early detection and identification and 3) remediation.

**Prevention**

Prevention begins with exclusion and cleanliness. Every employee must shower and wear clean uniforms before entering the facility. Each cultivation and processing room will be equipped with a closed-circuit HVAC atmosphere system. The facility itself, and other critical areas that pose potential contamination concerns, will use a two-door entry chamber (man-trap) to physically prevent pathogen contamination. We will use color-coded symbols mounted on each door to alert users of any identified pest problems or quarantines.

Plants and products will undergo daily naked eye scouting and weekly room inspections. Plant inspection starts at soil-level moving upward through the canopy. Agents will look underneath the leaves for pests and on the upper surface for signs of nutritional deficiencies. Any pests or contagions detected are bagged and photographed for identification and archive records.

Additionally, all grow and processing room surfaces, air filters, and irrigation equipment are examined for evidence of pest and pathogen contagions.

**Early Detection and Identification**

BrightStar Biomedics will use sticky stakes as an early detection system for the presence of pests. These sticky stakes are free of chemical pesticides and provide help detecting the presence of pests before they become a problem. This approach allows us to prepare a response to pest presence that is specifically targeted (by identifying the pests on the traps) and helps monitor variations in pest populations.

Sticky stakes will be placed in every area that houses plant tissue and other strategic areas. Insect monitoring sticky traps will be placed at a rate of one per 200 square feet to provide quick recognition of pest problems. The sticky traps are not effective at remediating pests, but
they provide a sampling tool for estimating total population size and the rate of change in population activity relative to remediation actions.

**Remediation**

Pheromone/yeast traps and predator insects and microbes are employed as IPM tools. The first step towards remediation is identification. All cultivation staff will be thoroughly trained in pathogen identification. Several references will be used in identification and remediation, including:

- Knowing-Recognizing Glasshouse Pests (Koppert 2003)
- Greenhouse IPM (PennState 2005)

All contagions will be photographed, identified, and recorded in both our electronic recordkeeping system and in a Grower’s Journal. BrightStar Biomedics utilizes only organic, food-safe pest remediation measures including predatory insects, inoculated foliar sprays, plant-based essential oils, temperature control, and CO2 suffocation techniques.

BrightStar Biomedics may choose to introduce beneficial insects to fight pests when they are first detected. Beneficial insects are more effective when introduced at the very early stages of detection, as they need time to establish their presence in the affected area. The use of sticky stakes will give us this option, as that is a very early detection system.

**Department Treatment Orders**

BrightStar Biomedics intends to immediately and effectively eradicate any plant pest found at our facility. However, should BrightStar Biomedics fail or refuse to eradicate a plant pest that is found at our facility, we understand that the Department, in cooperation with the Department of Agriculture, may issue and enforce a treatment order against BrightStar Biomedics including an order to eradicate, for any immature medical marijuana plants or medical marijuana plants that may carry or harbor the plant pest. We understand such order will be issued in writing and set forth the necessary treatment, control or eradication measures required. Should this occur, BrightStar Biomedics will immediately comply with the order, and we understand that if we do not comply, the Department, acting in cooperation with the Department of Agriculture, may carry out the control measures established in the treatment order with all expenses associated with the measures accruing to BrightStar Biomedics.

**Department Quarantine Orders**

BrightStar Biomedics understands that the Department of Agriculture, acting with the cooperation of the Department, may establish a quarantine to prevent the dissemination of plant pests within the Commonwealth or to prevent or delay the introduction of a plant pest into the Commonwealth from any country, state or territory. Upon finding a plant pest in a facility that has the potential to cause serious damage to other grower/processors or to agriculture in general, the geographic area in which the plant pest was found and any adjacent areas as the Department of Agriculture deems necessary may be quarantined.
BrightStar Biomedics understands and will comply with any quarantine order from the Department that may establish conditions and restrictions determined by the Department of Agriculture to be necessary to prevent or reduce the movement of the plant pest from the quarantined area. Vehicles or any means of conveyance suspected of carrying the plant pest may also be subject to quarantine and a treatment order may be issued as necessary to eradicate the plant pest. We understand that the quarantine order may regulate the planting, growing or harvesting of any immature medical marijuana plants or medical marijuana plants that serve as a host or reservoir for the plant pest within the quarantined area and may include prohibiting the processing of a specific harvest batch or harvest lot of medical marijuana within a specific geographic area or during a specified time period. An immature medical marijuana plant or medical marijuana plant suspected of harboring the plant pest may be ordered to be treated or destroyed.

Facility Design and Plant Movement
Another important element of our systemic approach to pest prevention is the layout of our facility. BrightStar Biomedics’ floor plan design will provide for an easy flow of work in progress (WIP). The key element is positioning propagation, grow, harvest, extraction, infusion, packaging, labeling and storage rooms so that plant material is always moving in one specific direction between rooms. While advancing through the process, plant material and processed product should never move back and forth.

It is our mission to produce medical marijuana that is safe for patients and IPM is a critical element in creating a healthy environment for plants to be grown and products to be manufactured in a manner that protects the health of patients and our staff. Proper use of IPM can reduce the need to use pesticides and ultimately protects workers and patients while delivering medical marijuana that is safe and free of contaminants.

Inspection Schedules
BrightStar Biomedics will perform visual inspections of growing plants, harvested plant material, extracts, in-process products and final products ready for sale to ensure there is no visible mold, mildew, pests, rot, or grey or black plant material that is greater than an acceptable level as determined by the Department.

Integrated within our SOPs are regularly scheduled inspections and scouting. Plants will undergo daily naked eye scouting and weekly grow room inspections utilizing 30x or greater magnification lenses. Plant inspection starts at soil-level moving upward through the canopy. Agents will look underneath the leaves for pests and on the upper surface for signs of nutritional deficiencies. Any located pests or contagions are bagged and photographed for identification and archive records. Mineral deficiencies are reported to a manager and recorded within the seed-to-sale software.

Similarly, all products post-harvest, including extracts and infused products, must also undergo scheduled inspections. Staff will be instructed to carefully review each product/material for signs of contamination or other issues at key process checkpoints (e.g., immediately after the extraction process, upon each transfer of product from one room to another, upon/during/after packaging, upon/during/after shipment preparation,
upon/during/after product delivery, etc.).

Any products suspected of an issue will be transferred to quarantine immediately for further investigation.

Additionally, all room surfaces, air filters, and irrigation equipment are examined for evidence of pest and pathogen contagions.

**Medical Marijuana Handler Restrictions**

All employees working in direct contact with medical marijuana are subject to the restrictions on food handlers in 28 Pa. Code §27.153 (relating to restrictions on food handlers). Employees must conform to best hygiene and sanitary practices while on duty, including:

- Maintaining adequate personal hygiene
- Wearing proper clothing, including gloves
- Washing hands thoroughly in an adequate hand-washing area before starting work and at any other time when hands may have become soiled or contaminated

Employees handling medical marijuana in processing operations must utilize facemasks and gloves in good operable condition, as applicable to their job functions.

Employees must wash hands per established SOPs when handling medical marijuana. These requirements include washing hands with soap and hot water before beginning work, after using the lavatory and after meal breaks. Employees who are showing signs of illness, open wounds, sores or skin infections will be sent home and not allowed to handle medical marijuana until fully recovered. These instructions will be posted in appropriate areas such as lavatories, kitchens, break rooms and lunch areas, and in multiple languages, as needed.

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

**Hand-Washing Facilities**

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

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

Notably, BrightStar Biomedics will comply with all other applicable state and local building code requirements and will be ADA compliant.

**Hygiene**
All employees will be required to come to work in a clean and hygienic manner. Staff will be required to frequently wash their hands, particularly after handling medical marijuana, handling equipment coming into contact with medical marijuana, coming into contact with any other person, and after eating or using the restroom. Employees failing to follow hygienic protocol may be subject to suspension or termination. The hygiene policy will help ensure a safe, sanitary, sterile, contamination-free workplace environment.

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

**OSHA Compliance**

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

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

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

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

**Injury and Illness Prevention**

BrightStar Biomedics will require staff to report to a supervisor any personal health condition that might compromise the cleanliness, sanitation, integrity, safety, or quality of our facility or the medical marijuana the agent might handle, or that might impact the health and safety of visitors or other staff members. To ensure this, we will require agents to be thoroughly trained and tested on our SOPs, including ensuring a clean and sanitary workplace. All illnesses and health conditions reported will be treated with extreme precaution. Employees will never be reprimanded for disclosing a health condition to a supervisor.
When notified, management and any onsite healthcare professionals will use their best judgment to protect the interests of the facility, always erring on the side of caution. Optional action plans include:

- Addressing the situation to eliminate the possibility of a cleanliness or quality issue with medical marijuana which might be handled by the employee (such as providing gauze or a band-aid in case of a minor cut)
- Segregating the employee from interacting with other persons and prohibiting them from handling medical marijuana
- Sending the subject employee home for the day to rest
- Advise the subject employee to visit the emergency room or a medical specialist

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

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

Section 21 – Quality Control and Testing for Potential Contamination

By checking “Yes,” you affirm that quality control measures and testing efforts must be in place to track active ingredients (THC and CBD) and potential contamination of medical marijuana products.

☐ Yes ☐ No

Section 22 – Recordkeeping

Please provide a summary of the recordkeeping plan that will be in place at your proposed facility and site. The plan should cover, but is not limited to, the following: a system for monitoring, recording, and regulating temperature, humidity, ventilation, water supply, and lighting that affects the growth of medical marijuana plants, an equipment maintenance log, and records of inventory and all transactions.

Recordkeeping Plan

BrightStar Biomedics will develop and implement a plan to use established recordkeeping procedures adopted, and modified accordingly, from our medical marijuana industry affiliates in Maryland, Massachusetts, and Washington DC. In accordance with protocol and with 28 PA Code §1151.30 (regarding inventory data) and 28 PA Code §1151.36 (regarding transport
manifest), BrightStar Biomedics will create and maintain written and/or electronic records, as appropriate, and securely store them for a period of at least four years. In addition, in accordance with 28 PA Code §1151.39 (regarding electronic tracking system), BrightStar Biomedics shall use the electronic tracking system prescribed by the Pennsylvania Department of Health (the Department) containing the requirements in section 701 of the act (35 P.S. § 10231.701).

**Electronic Recordkeeping Software**

To generate and maintain electronic records, including but not limited to inventory tracking
number of the staff member taking the relevant action so that we know who is/was responsible.
Human Resources Records

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

Diversity Plan Records

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

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

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

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

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

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

Pursuant to SOPs, BrightStar Biomedics will also maintain an accurate log recording the maintenance of equipment, cleaning of equipment and calibration of equipment. Agents will be properly trained on calibration and recordkeeping protocol.
Pennsylvania Department of Health
Medical Marijuana Grower/Processor Permit Application

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

SECTION 23 – ORGANIZATIONAL STRUCTURE

Applicant’s Form of Organization
Check One

☐ C-Corporation ☐ S-Corporation ☑ Limited Liability Company
☐ Sole Proprietorship ☐ Partnership ☐ Limited Liability Partnership
☐ Limited Liability Limited Partnership ☐ Non-Profit Organization ☐ Other (explain): 

Applicant’s Organization Documents
State of Incorporation or Registration: Pennsylvania Date of Formation: 01/06/2017
Business Name on Formation Documents: Brightstar Biomedics, LLC

Applicant’s Identification Numbers
Federal Employer ID number: PA Unemployment Compensation Account Number:

81-5451986 n/a

PA Department of Revenue Tax number (if applicant is currently doing business in Pennsylvania):

n/a

PA Workers’ Compensation Policy Number (if applicant is currently doing business in Pennsylvania):

n/a

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 24 – BUSINESS HISTORY AND CAPACITY TO OPERATE
Describe your business history and your ability and plan to maintain a successful and financially sustainable operation:
BrightStar Biomedics, LLC (BrightStar) is a company that was formed as a result of a sudden family tragedy experienced by the company’s founders in March of 2016. On March 30, 2016 Angela Vitale who was the wife of Bob Vitale the BrightStar CEO committed suicide after battling post-traumatic stress related depression, anxiety, and insomnia. Throughout her illness Bob and Angela often times discussed the possibility of utilizing medical marijuana as many other traditional pharmaceutical medications provided no relief. It was but 18 days after her suicide that Pennsylvania’s Medical Marijuana Act was passed giving hope to hundreds of thousands of Pennsylvanians. Act 16 was too late to help Angela but her suicide and the collateral damage caused by her death to a Northeastern Pennsylvania family and her community has ignited a fire inside many who have rededicated their lives. This is now a life Cause for us. The ownership and management team of BrightStar are poised to make a difference in the lives of many and lead this industry in Pennsylvania.

BrightStar was formed by a group of women and veterans with significant experience as entrepreneurs and healthcare professionals with the purpose of applying for a medical marijuana grower/processor license in the Northeast Health Region. These women, who own 62% of BrightStar are family or close friends of Angela, and came together for the reasons outlined above. Another 12% is owned by Bob Vitale who is a United States Marine Corps veteran. BrightStar’s focus is to produce pharmaceutical grade medical marijuana for the treatment of serious medical conditions outlined in the Medical Marijuana Act. BrightStar’s mission is to follow a commercialization strategy that is modeled on the more traditional pharmaceutical and biotechnology industries. BrightStar’s Executive Management team and Professional Advisory Board is comprised of a majority of Pennsylvania natives with significant experience in business, finance, law enforcement, medicine, regulatory compliance, pharmacy, research, controlled-substances manufacturing, and the medical marijuana profession. BrightStar has partnered with a large multi-state operator of medical marijuana organizations currently operating 5 medical marijuana enterprises in various states. It’s multi-state partner owns and operates Holistic Industries LLC (MD), Holistic Industries, Inc. (MA), Holistic Remedies, LLC (DC), Organic Wellness LLC (DC), and Tacoma Wellness Center (DC) have formed one of the strongest partnerships in Pennsylvania.

BrightStar has carefully assembled a Pennsylvania-centric team with deep roots in the state and believes local ownership with national support is a key differentiator for them. The BrightStar team has extensive specialized experience in developing successful business enterprises which can withstand the growing pains of the new medical marijuana program, we also bring a significant degree of broader business experience, many years of expertise in the legal sale of controlled substances (i.e., wine and spirits), national company leadership, an entrepreneurial spirit, world class medical and pharmaceutical professionals, and a deep passion for the well-being of those who suffer with the serious medical conditions.
BrightStar’s executive management team and board members flaunt substantial, and directly relevant, business experience in highly regulated, and in many cases customer-facing, industries beyond Medical Marijuana. Examples include, GlaxoSmithKline, Eli Lilly & Co., Dendrite Americas, Merck Pharmaceuticals, Johnson and Johnson (pharmaceutical manufacturing, sales and research), Medtronic (medical device sales and business development), and Cyberonics (medical device research), as well as Schneider’s of Capitol Hill (wine and spirit retail, wholesale, import/export, and distribution). With decades’ worth of strong regulatory compliance history both within and beyond medical marijuana businesses, our impeccable integrity, acumen, transparency, and attention to detail is unrivaled.

Key Competitive Differentiators

- Local Pennsylvania ownership supported operationally by large multi-state operator.
- Some of the most successful Entrepreneurs and Innovators in Pennsylvania coming together to make a tangible difference for people in need. A group that’s driven by a real cause.
- Most Experienced Security and Diversion Experts on any PA application: 31 year DEA veteran who was on the front-lines of the War on Drugs, ran many drug enforcement operations around the World, Responsible for briefing Joint Chiefs of Staff and Department of Defense on agency activities.
- Ability and Resources to be First to Market in Pennsylvania.
- More than 40 Distinct Medical Varietals of Marijuana Available Immediately, some Exclusive to BrightStar.
- Cutting-Edge and Propriety Processing Methods.
- More than $61.5 million in Capital Sufficiency to execute on our strategy along with financial discipline required to bring this project to fruition. We believe this amount of available capital would put us in the top tier of state for G/P applicants.
- Immediate Access to the most Advanced Physician and Patient Education Platforms in the Industry.
- Unparalleled Key Industry Players.
- Direct Access to Major Health Networks Executives and Boards of Director.
- Legitimate Experience in Highly regulated industries.
- A Corporate Culture of Promoting Innovation, Perpetual Improvements and Diversity.
- Partnerships with Leading Medical and Education Institutions in Pennsylvania.
- Team includes Medical Director and Staff from the Major Hospitals and Health
Systems in the Region.

- Detailed Market Development Strategy with High Level Professionals Ready to Execute.
- BrightStar’s team is comprised of one of the most diverse groups of women, minorities and veterans in Pennsylvania applying for a license.
- Substantial local, regional and state level support including community leaders, religious institutions, Colleges & Universities, pediatric cancer organizations, epilepsy organizations, LGBT organizations, veteran’s groups, and many other groups.
- Veterans Helping Veterans and Combating Suicide.

Brightstar believes the majority of our GP applicant competitors around the Commonwealth of Pennsylvania are focused on product production. There business model is setting up a warehouse and essentially “growing weed in a warehouse.” This approach is pretty obvious to us as it would be to any operator. Our ownership group is already very successful, significant operators in the Medical Marijuana market with a proven track record. We believe we are well positioned to grow our plants and be first to market. However, the growing aspect of this Pennsylvania initiative is a fairly exact science. It’s clearly understood the requirements to setup a successful grow operation and we have all of those components as you can note in the other sections of our documentation. To simplify this approach; seeds, lighting, water, soil related base, and controlling temp and environment are the successful characteristics to a successful grow operation.

Brightstar’s other tangibles as well as intangibles will clearly set it apart from any competitors in the Commonwealth of PA. We believe these key elements will allow us to stand tall over any other GP we are put up against:

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

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

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

- We have met with and presented our plans and coordinated efforts with some of the most well know organizations at the forefront of advocating for there patient populations. We know that other organizations have not garnered the support of these organizations as our discussions and relationship have been exclusive. We will be partnering with the following key organizations:
  - Pediatric Cancer Foundation
  - PA Epilepsy Foundation
  - Veterans groups
  - University Partnerships
  - LGBTQ Advocacy Groups

- We have separate team ready to setup the grow operations and be first to market in Pennsylvania but again we think this is fundamental and a given to anyone awarded a license.

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

**Leadership**

BrightStar’s CEO Robert Vitale is a Pennsylvania native who comes from humble beginnings, he is one of ten children raised in a one bedroom home along the river in West Nanticoke, PA and has become a highly successful CEO and Entrepreneur in building his own companies after succeeding at the highest levels of several national and international organizations. Today Bob owns and leads one of the largest managed labor companies in the U.S. and employs more than 3,000 people nationally with 90% being diverse. He has been involved in several very successful startups that began with just a concept or a hole in the ground type idea but developed into industry leaders and large national companies. A CPA by trade Bob’s business expertise spans strategy, leadership, manufacturing, operations, business
development, risk-management, IT, HR, & finance. With significant experience building lean manufacturing companies from the ground up utilizing six sigma practices and efficiency protocols in manufacturing to increase productivity and reduce production cost Bob is well poised to be the top Leader in the new Pennsylvania medical marijuana program.

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

Beginning last summer BrightStar’s CEO Bob Vitale and President Josie Vitale went on a listening tour, meeting with physicians, local officials, State Senators and House Members to receive input and feedback on their business plan. They learned there is heartfelt concern regarding the opioid crisis, and a hope that the Pa. MMJ program may help to address this unrelenting epidemic. They saw first-hand the concern state lawmakers felt for children with intractable epilepsy, the desire to help patients with PTSD and other ailments covered under Act 16. They confirmed that these stakeholders want the medical marijuana program to work from a healthcare standpoint but also from an economic development standpoint as many communities still struggle for job growth with a deserving and skilled workforce willing and able to step up to the challenge of this new industry.

BrightStar’s leadership in Operational Acumen is apparent, the team includes experts in Manufacturing, Cannabis, Pharmaceuticals, compliance and Medicine. Leadership in medical marijuana is brought forth by COO Josh Genderson, a national leader in Medical Marijuana and whose experience is exclusively in highly regulated medical markets. He is General Manager of both Holistic Remedies and Organic Wellness, two of the top licensed grower/processor facilities in Washington D.C., home of one of the countries most stringently governed Medical Marijuana programs. Under his tenure, both licensees have become D.C.’s only operators to cultivate and manufacture high CBD (and low THC) medical marijuana products designed specifically to help qualifying pediatric patients suffering from seizures and associated symptoms. Both companies have flawless compliance records, boast strong relationships with program regulators and the Metropolitan Police Department, and have consistently supplied safe, high-quality medical-grade Marijuana products to 10,000+ patients.
registered patients. None of his facilities have ever suffered a crop failure nor large-scale pest/disease infestation and both lead the local program in the consistent supply of top quality medicine (often requested by brand name from patients). Josh has been very active promoting the Pennsylvania MMJ program and has served on multiple panels in an effort to educate and promote the new industry. Most recently, Josh was the keynote speaker at Lafayette College where he presented on the challenges of setting up a new medical marijuana industry.

Cultivation and processing will be led by one of the nation’s top experts in Cannabis, Dr. Adam Kavalier, Ph.D. Adam has over 10 years of research experience in analytical chemistry with specialties in medicinal plants and cancer pharmacology. After receiving his Ph.D. in plant chemistry from the City University of New York and The New York Botanical Garden, Adam continued his research at Cornell Medical College where he focused on cancer bioenergetics. Using analytical techniques including liquid chromatography and mass spectrometry Adam applied global metabolite profiling tools to study the accumulation of active compounds in plants and the bioenergetics intermediates in cancer metabolism. His work resulted in more than 10 peer-reviewed publications and a patent. In 2014 Adam established a food business focused on the production of chocolates containing high concentrations of biologically active medicinal compounds. Adam joined BrightStar in 2016 to head the research and development of new Medical Marijuana products, focusing his work on the purification and isolation of active compounds using optimized solvent extraction, chromatography and distillation. As a part of this work, Adam has developed and validated Standard Operating Procedures and Good Manufacturing Practices to ensure safe and consistent manufacturing of pharmaceutical grade products specific to Medical Marijuana processing operations.

Pharmaceutical Manufacturing experience is addressed by a strong and unique partnership with one of the nation’s top schools of pharmacy. BrightStar has entered into an exclusive partnership with the University of Sciences where the university will provide on-going multi-specialty expertise in pharmaceutics, medical technical writing, pharmacy modeling, pharmaceutical manufacturing and survey based outcomes research.

Head of Diversion Control, Joseph P. Salvemini served 31 years in DEA. He spent his career protecting Americans from violent drug cartels and leading the fight against the illegal drug trade. Joe was a lead agent during some of the most notorious operations in DEA history during the 80’s and 90’s. Joe is committed to keeping drugs out of the hands of children without a prescription and anyone else who cannot legally possess them. BrightStar is fortunate to have such an accomplished law enforcement professional on its team. The best deterrent of diversion is a trustworthy, professional and highly trained staff. All BrightStar staff will undergo group and one-on-one security related training under the direction of Mr. Salvemini, including diversion prevention and detection techniques as well as appropriate
remediation plans. Aside from comprehensive criminal background checks and thorough
interviews prior to hire, each employee will be required to sign annually a company Code of
Conduct affirming each person’s commitment to the prevention of diversion and product
control. As Joe has done his entire career, he will oversee the sourcing of security
department candidates from the local talent pool, particularly those with prior law
enforcement experience. Experienced personnel who are highly trained security
professionals will also help prevent diversion. Security department members will be on duty
and patrolling our facilities during all hours in compliance will state and local requirements.

Michael P. Edmiston is BrightStars VP of Legal and Compliance. Compliance is nothing new
for Mike, he spent 6 years as a top lawyer with the Pennsylvania Gaming Control Board
(GCB). In this capacity Mike was one of the first attorneys hired by the GCB and was
responsible for helping set up the regulatory scheme that governs the industry as well as
serving as Director of Hearings and Appeals. Prior to joining the GCB, Mike served in the PA
House of Representatives as General Counsel to the Speaker, General Counsel to the Majority
Leader and Executive Director and Chief Counsel to the House Judiciary Committee. His
attention to detail will be a major asset and his extensive experience overseeing highly
regulated industries will make BrightStar a leader in compliance.

Market Development

BrightStar will be an innovative entry to the Pennsylvania medical marijuana program and
will focus on patient outcomes rather than solely on product production. For BrightStar our
most important product will be the efficacy and outcomes data we generate through our
formal partnerships with University of the Sciences, Bloomsburg University and King’s College
to survey our post-market products. Our pharmaceutical manufacturing experience is further
bolstered by this exclusive relationship with University of the Sciences where they will
provide on-going consultation on many areas including medical-technical writing for product
labeling and IFU, Pharmaceutical Manufacturing expertise, pharmaceutical marketing,
physician and patient education platforms aimed at increasing the available consumer
market, and post-market product survey analysis for Health Economics and Outcomes
Research.

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

BrightStar’s Chief Medical Officer Neurosurgeon Dr. Mark Li will lead the effort to educate physicians in selective sub-specialties to isolate patient populations in demand of new treatment options and direct the Health Economics and Outcomes Research program. BrightStar will implement a broad-based physician targeting and adoption program to educate, train and facilitate certification of physicians during build-out phase in an effort to evade the slow market maturation seen in other states. The day BrightStar is granted a license, BrightStar staff, lead by Dr. Li, will begin the physician outreach and education program. It is widely recognized that chronic intractable pain represents the largest market potential with regard to patient prevalence. There are approximately 150,000 active chronic pain patients in the Geisinger Health System alone, Geisinger is the closest regional health system to BrightStar’s proposed grower/processor site. In an effort to directly target the pain population and in response to the common concern around the opioid crisis BrightStar has engaged Dr. Farooq Qureshi, one of the region’s top pain management specialists. In his role as Clinical Program Director, Dr. Qureshi will be responsible for creating the infrastructure to directly address chronic pain syndrome through the appropriate use of medicinal marijuana. This plan creates a care-volume matrix that will guarantee the economic health of BrightStar while actively reducing the number of opioid pain prescriptions needed in the Commonwealth. The medical and clinical acumen of the BrightStar team is unmatched.

The traditional approach in other emerging medical marijuana markets has been a focus on product production and an "if you build it they will come" market development strategy. BrightStar will not follow this lackadaisical strategy. In fact, BrightStar’s focus on demonstrated patient outcomes will be a disruptive innovation to the typical dynamic. Creating a market value on patients rather than solely on products will ensure a more responsive increase in the maturation of the patient/provider market. This focus on patient outcomes is a more specific reflection of the way typical pharmaceutical agents are adopted by physicians and care providers. Physicians analyze outcomes data in specific patient populations and implement these new treatment options where patients can medically or symptomatically benefit.

Unlike many of our competitors in Pennsylvania, BrightStar has extensive capital on-hand and is ready to deploy these funds as soon as a license is awarded without the need to incur debt or undergo a capital raise. The company is reporting more than $61.5 million in capital sufficiency on hand in its Capital Sufficiency Affidavit. A significant portion of this is cash and marketable securities. BrightStar will be able to begin retrofitting the facility and prepare for operations immediately. BrightStar believes in the principles of financial discipline and sound business judgment and will run the most efficient operation in the Commonwealth. BrightStar will pass these saving onto its patients and will take cost saving measures to keep product prices affordable, allowing every patient suffering from a serious medical condition to access medication. Accordingly, BrightStar will build our world class facility in pre-
determined phases to manage growth and allow sufficient flexibility to complement any changes in patient demand as the market matures, just as our executive management team has done in every other start-up business and our multi-state partner did in other states.

BrightStar’s executives and staff are among the most established, longest running Medical Marijuana operators on the East Coast (which is decidedly more sophisticated, rigid, and demanding from a regulatory and manufacturing perspective than West Coast programs). As more states implement Medical Marijuana programs, it is apparent the key to remaining at the forefront of the industry is by hiring an experienced and highly motivated staff, developing an unrivaled training program, promoting continuing education, continuing to leverage know-how and advancements from related industries (such as pharmacy, healthcare, product manufacturing, agriculture, etc.), we must be relentless in our pursuit of new technologies, equipment, and methodologies, instill appropriate checks and balances in our processes, incorporate new studies and research that improve our business model, product offerings, and generally create a culture promoting efficiency, innovation, and perpetual improvements at all levels.

Our industry leading processing techniques will incorporate the latest equipment and technology, as overseen by an expert in all major botanical extraction methods currently employed in the industry, to confidently produce uniform, predictable, and consistent medical marijuana products. Our team is very familiar with and currently utilizes processing methodologies that will be employed in Pennsylvania, which include, heat-based extraction, agitation extraction, press extraction, steam distillation extraction, and carbon dioxide, soxhlet, and other chemical (mixed and pure form) solvent extractions using closed-loop systems that recapture almost 100% of the solvents used. Virtually no other medical marijuana company in the country employs a botanical extractions expert with the same background, pedigree, and experience as BrightStar. Our botanical expert has developed extraction procedures which either preserve or intentionally remove terpenoid content in the resulting extract material depending on the intended final product and its desired characteristics, meaning we have the unique ability to create more variations of each medical marijuana-infused product type than any competitor.

BrightStar engages expert consultants when necessary in key cultivation and processing areas to ensure it remains at the forefront of new advancements. We expect to be industry leaders and believe that by employing the top minds in various related disciplines, including research, we will solidify and maintain our position as the preeminent medical marijuana provider in Pennsylvania. Aside from domain experts, we regularly engage with leadership from Americans for Safe Access (ASA), Marijuana Policy Project (MPP), and other highly regarded Medical Marijuana industry groups, giving us unrestricted access to volumes of information on industry trends, regulatory changes, educational advancements, and new research opportunities. Since 2011, members of the Management Team and Advisory Board have
been operating as licensees in the medical marijuana industry, maintaining a standard of excellence in the production of innovative medical marijuana products and patient-focused care. We are highly confident in our ability to quickly become the preeminent medical marijuana research organization in Pennsylvania.

BrightStar’s team includes the most advanced medical marijuana cultivators, processors and dispensers in the country. By virtue of our collective experiences, we have developed Standard Operating Procedures (SOP’s) that mirror pharmaceutical manufacturing production policies and procedures which will be used to train our locally sourced Pennsylvania staff. BrightStar will bring over 40 distinct varietals of Medical Marijuana to the Pennsylvania market. Some of these varietals are available in other programs across the country, whereas others are truly unique to BrightStar. BrightStar has engaged experts, national and international, Medical Marijuana consultants, cultivators, breeders, and seed banks, to locate proprietary varietals not available to any competitors in Pennsylvania. When appropriate, we are ready to execute a strategy to develop medicines that are available only through our Pennsylvania grower/processor facility.

BrightStar expects to produce and sell a wide assortment of Medical Marijuana products using a variety of proprietary extraction and infusion techniques in strict compliance with Pennsylvania’s law. To facilitate a variety of routes of administration used by patients (including specialized products to treat children), BrightStar will specifically produce a sufficient assortment of products types and forms manufactured using a range of medical marijuana varietals to achieve the desired medicinal effects. No two patients are alike, so as a top-tier provider of healthcare, we are responsible to offer an appropriate spectrum of medicinal products for distribution. At BrightStar, we place an important focus on educating our patients on the significance of CBD therapy.

To ensure the highest possible quality of our manufactured products and our reputation as the preeminent medical marijuana provider, BrightStar will adopt and adapt all quality monitoring and quality improvement measures identified in our SOP’s and employed by our affiliates (among the longest operating grower/processors on the East Coast) who have been consistently and reliably producing only the safest, highest quality, contaminant-free medical-grade products since 2012. Our quality assurance procedures are established and intentionally redundant in a number of key processing checkpoints to ensure the integrity, quality, purity and contaminant-free nature of all medical marijuana products we produce.

Every action taken to plants or products throughout our manufacturing and dispensing processes is recorded in our electronic inventory tracking system. Analyses of inventory reports are used for quality monitoring and quality improvement purposes. Authorized staff will be tasked to constantly analyze and assess all plants and products during every stage of the manufacturing and dispensing processes to prevent and/or mitigate any deficiencies, pest/disease outbreaks, or other issues which could be detrimental to product safety and
quality. Redundant techniques include spot checks, staff and managerial inspections, and internal testing will be used. Further, the Quality Control Supervisor will ensure a random sample of each batch/lot of product is tested by a reputable independent laboratory for cannabinoid profile, contaminants and stability analysis prior to unit-packaging for eventual dispensing (such test results will appear on applicable product labels).

Additional measures to product quality and quality improvement include: implementing clean room protocols (similar to pharmaceutical manufacturing), daily facility and equipment sterility and cleanliness protocol, utilizing HEPA filters and other filtration devices, promoting staff hygiene, assuring Good Agricultural and Manufacturing Practices, using process validation testing and confirmation prior to full adoption, and promoting a healthy workplace environment. BrightStar is committed to researching novel technologies and advancements to stay ahead of new trends, techniques, equipment, and protocol not only with regards to the Medical Marijuana industry but also to the traditional agriculture, pharmaceutical manufacturing, biotech, medical, and pharmacy industries.

As evidenced above, many members of our Executive Board and Professional Team have strong local ties and have been engaged in local charitable organizations, non-profits, and other organizations for many years. BrightStar is committed to supporting its communities through a variety of means, including local hiring policy, free educational outreach, low-income patient subsidies, strategic investments in local municipalities and community-based organizations (similar to Host Community Agreements our affiliates have executed elsewhere). BrightStar is an equal opportunity employer and will employ the highest quality applicants regardless of race, color, creed, religion, sex, gender identity, sexual orientation, disability, age, socioeconomic status, or national origin. BrightStar promotes diversity as evidenced by the composition of our Executive and Professional Advisory Board’s which includes racial and religious minorities, as well as women and veterans. BrightStar believes a diverse company is vital to facilitating innovation and strong corporate culture and promoting a safe and happy workplace. Notably, our affiliates have hired diverse staff in every state where we operate and will continue this policy in Pennsylvania. BrightStar is in the process of being certified by a Pennsylvania approved third-party certifying organization as diverse and once certification is received it will be provided to the Department of Health.

SECTION 25 – CURRENT OFFICERS

PROVIDE THE POSITION, TITLE IN THE APPLICANT’S BUSINESS, AND ADDRESS INFORMATION FOR ALL CURRENT OFFICERS, DIRECTORS, PARTNERS OR TRUSTEES.

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<tr>
<td>Robert</td>
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**Occupation:** President & CEO, Horizon Facility Services

**Title in the applicant’s business:** CEO

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**Occupation:** President & CEO

**Title in the applicant’s business:** COO

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**Occupation:** Medical Device Sales Manager

**Title in the applicant’s business:** President

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**Occupation:** COO

**Title in the applicant’s business:** CFO

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<tr>
<td>Suffix:</td>
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<tr>
<td>Occupation:</td>
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SECTION 26 – OWNERSHIP

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

169
(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 LLCs

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<tr>
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<tbody>
<tr>
<td>First Name: Robert</td>
</tr>
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<td>Middle Name:</td>
</tr>
<tr>
<td>Last Name: Vitale</td>
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**Occupation:** President & CEO, Horizon Facility Services

**Title in the applicant’s business:**

*DOH Redacted*

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<td>12.34%</td>
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<th>Terms, conditions, rights and privileges:</th>
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### Name and Residential Address

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<tr>
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**Occupation:** President & CEO

**Title in the applicant’s business:** COO

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**Department of Health**
## Pennsylvania Department of Health
### Medical Marijuana Grower/Processor Permit Application

<table>
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<tr>
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<th>Acquired</th>
<th>outstanding voting stock</th>
<th>and privileges</th>
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<td>26%</td>
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**Name and Residential Address**

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<th>Middle Name:</th>
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**Occupation:** Medical Device Sales Manager

**Also known as:** Josie

**Date of birth:** DOH REDACTED

**Title in the applicant’s business:** President

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<th>Date Acquired</th>
<th>Percentage of outstanding voting stock</th>
<th>Terms, conditions, rights and privileges</th>
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<td>12.33%</td>
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**Name and Residential Address**

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<th>Middle Name:</th>
<th>Last Name:</th>
<th>Molewski</th>
<th>Suffix:</th>
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**Occupation:** Housewife

**Also known as:**

**Date of birth:** DOH REDACTED

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

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<thead>
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<th>Stock type or class</th>
<th>Number of shares</th>
<th>Date Acquired</th>
<th>Percentage of outstanding voting stock</th>
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**Name and Residential Address**

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<th>Middle Name: Elizabeth</th>
<th>Last Name: Hall</th>
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**Occupation:** Occupational Therapist

**Title in the applicant's business:** Owner

**Also known as:**

**Date of birth:** DOH REDACTED

**Stock type or class:**

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**Name and Residential Address**

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<th>First Name: Samantha</th>
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**Occupation:** Media Specialist, Parkland School District

**Title in the applicant's business:** Owner

**Also known as:**

**Date of birth:** DOH REDACTED

**Stock type or class:**

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Pennsylvania Department of Health
Medical Marijuana Grower/Processor Permit Application

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### Name and Residential Address

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**Occupation:** Housewife

**Title in the applicant’s business:** Owner

**Also known as:**

**Date of birth:**

**Stock type or class:** Series A Membership Units

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**Occupation:**

**Title in the applicant’s business:**

**Also known as:**

**Date of birth:**

**Address Line 1:**

**Address Line 2:**

**Address Line 3:**

**City:**

**State:**

**Zip Code:**

**Phone:**

**Fax:**

**Email:**

**Stock type or class:**

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**MM/DD/YYYY**
# Pennsylvania Department of Health
## Medical Marijuana Grower/Processor Permit Application

### Name and Residential Address

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# B. FOR PARTNERSHIPS AND LLPs

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

**Percentage of ownership:**
- [ ]

**Partnership participation from:**
- [ ] _

**Description of participation in operation of the applicant:**
- [ ] _

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## Name and Residential Address

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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:**
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- [ ] Other: _

**Percentage of ownership:**
- [ ]

**Partnership participation from:**
- [ ] _

**Description of participation in operation of the applicant:**
- [ ] _
## Pennsylvania Department of Health
### Medical Marijuana Grower/Processor Permit Application

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Pennsylvania Department of Health
Medical Marijuana Grower/Processor Permit Application

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Pennsylvania Department of Health
Medical Marijuana Grower/Processor Permit Application

Phone: __________ Fax: __________ Email: __________

Partner Type: __________________________ Partnership participation from: __________

☐ General/Full Partner Percentage of ownership: __________

☐ Limited Partner Description of participation in operation of the applicant: __________

☐ Dormant/Silent Partner MM/DD/YYYY

☐ Other: __________

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: __________________________ Partnership participation from: __________

☐ General/Full Partner Percentage of ownership: __________

☐ Limited Partner Description of participation in operation of the applicant: __________

☐ Dormant/Silent Partner MM/DD/YYYY

☐ Other: __________

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

First Name: Laurel Run Middle Name: __________ Last Name: __________ Suffix: __________

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Pennsylvania Department of Health  
Medical Marijuana Grower/Processor Permit Application

Lodge LLC

Occupation: Property Owner  
Title in the applicant’s business: NONE

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

Address Line 1: 3680 Laurel Run Rd  
Address Line 2:  
Address Line 3:  
City: Laurel Run  
State: PA  
Zip Code: 18706

Phone: 610-417-1833  
Fax:  
Email: mm610@verizon.net

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

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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 (Contd.)” in accordance with the attachment file name format requirements and include it with the attachments.

Section 27 – 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 the issuance of the permit:

<table>
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<tr>
<th>Activity</th>
<th>Estimated Date</th>
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DOH Redacted
**Part F – Community Impact**  
*(Scoring Method: 100 Points)*

**SECTION 28 – COMMUNITY IMPACT**

*PLEASE BE ADVISED, LETTERS OF RECOMMENDATION OR SUPPORT 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:

<table>
<thead>
<tr>
<th>Task Description</th>
<th>Date</th>
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<tbody>
<tr>
<td>Department awards permit to company</td>
<td>9/1/17</td>
</tr>
<tr>
<td>Finalize all plans and designs; select contractor</td>
<td>9/20/17</td>
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<tr>
<td>Submit building permit application to municipality</td>
<td>9/22/17</td>
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<tr>
<td>Begin Demolition activities</td>
<td>10/1/17</td>
</tr>
<tr>
<td>Begin construction</td>
<td>11/15/17</td>
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<tr>
<td>Begin management interviewing process</td>
<td>12/1/17</td>
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<tr>
<td>Begin management training process</td>
<td>12/15/17</td>
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<tr>
<td>Begin staff interviewing process</td>
<td>1/1/18</td>
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<tr>
<td>Begin staff training process</td>
<td>1/15/18</td>
</tr>
<tr>
<td>Order and install all cultivation and processing equipment</td>
<td>1/16/18</td>
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<tr>
<td>Obtain C/O</td>
<td>2/20/18</td>
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<tr>
<td>Pass Department of Health inspections</td>
<td>2/25/18</td>
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<tr>
<td>Begin operations</td>
<td>3/1/18</td>
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BrightStar Biomedics, LLC is a company that promises to be a reputable corporate entity with a focus on hiring diverse individuals, provide generous charitable engagement and be a good neighbor to its host community. BrightStar consists of talented and caring Pennsylvania's who have been engaged with their communities for many years. These highly successful individuals have given generously of their time, talents and treasures. BrightStar has been traveling throughout Northeastern Pennsylvania to discuss their business plan and collect feedback on implementation, outreach, community needs and educational opportunities within the communities it plans to operate. Below is a synopsis of these meeting and the associated relationships our organization has formed:

**Educational Partnerships:**

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

**Fredrick Pettit, Esquire, King’s College VP for Institutional Advancement**- Frederick supports the project and supplied a letter of support.

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

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

**Advocacy Groups**

**Epilepsy Foundation Eastern Pennsylvania (EFAPA)**- BrightStar has received a letter of support from the Epilepsy Foundation Eastern Pennsylvania and will provide EFAPA clients with resources, education and medications. Allison McCartin, President and CEO of the Foundation has written a letter supporting BrightStar.

**Pediatric Cancer Foundation of LHV**- Our organization has received a letter of support from the Pediatric Cancer Foundation of the Lehigh Valley which is partnering with BrightStar to provide resources to the children battling cancer and the families that support them. The Executive Director of the Foundation has written a letter supporting BrightStar.
Bradbury-Sullivan LGBT Community Center of the Lehigh Valley- BrightStar is partnering with the Bradbury-Sullivan LGBT Community Center. The partnership is based on education, community outreach and coordinated efforts to raise funds specific to the unique needs of the LGBT community. Founder Adrian Shanker wrote a strong support letter for BrightStar.

**Leadership Team**

BrightStar’s CEO Robert Vitale, is CEO of his own national managed labor company, Bob employs over 3,000 employees. He is proud that he gets to provide good paying jobs to people that otherwise would likely be unemployed. Having a 90% diverse workforce, Bob sees many of his early life struggles in his employees. Prior to starting his own company, Bob worked his way up through executive roles with national and global companies. He experienced the rewards of being a high level corporate executive, a big salary, world travel and a corner office in Times Square. However, to understand where Bob is going, you must first understand where he has been. Bob’s worldview was shaped early in life while growing-up in abject poverty with his 9 siblings and parents in a dilapidated shack in West Nanticoke, Pennsylvania. Getting hand-me-downs meant wearing clothes that were worn by 5 older brothers before him. He learned work ethic at a young age out of necessity and he also learned the importance of charity because he was on the receiving end of it. Bob often talks about how excited he was to attend the annual Toys for Tots party at the Nanticoke High School where the Marines would give out toys. Upon graduating from high school, he joined the United States Marine Corps. This is the type of person he is, the Marines give poor kids toys, so he wanted to be a Marine. Further, most of Bob’s life was shaped by his older brother Steven who is intellectually disabled. Bob dedicated many weekends at Special Olympic events cheering Steven on and supporting him any way he could.

More recently, Bob faced the worst possible tragedy when his wife Angela committed suicide at age 39 after battling mental illness. He found himself alone with Ava (9) and Colton (8) and confounded about how to carry on. He did what comes natural to him, he organized a group to raise awareness and money for the American Foundation for Suicide Prevention. Bob, Ava and Colton recruited a team of over 65 to walk in the Lehigh Valley Coming Out of the Darkness Walk. Needless to say, they had the biggest group and raised the most money. As a suicide survivor and a man of action, Bob met with Congressman Dent to discuss the problems with the mental health delivery system and the lack of adequate funding. He is an active member of the National Alliance on Mental Illness (NAMI) and member and major supporter of the American Foundation for Suicide Prevention. Bob is a founding member of BrightStar and BrightStar itself was created out of the need to help others who are suffering with PTSD like Angela. The driving force behind BrightStar is to provide hope and light for anyone feeling like life isn't worth living. Bob is committed, and will spare no expense, to develop the most advanced team of researchers to discover the medications needed to help people suffering from serious medical conditions as well as depression, insomnia and anxiety. Bob serves on numerous non-profit boards and gives much of his wealth to charitable organizations. Bob’s generosity is an attribute that is already well established and well demonstrated within Bob’s character and throughout his life. There is no doubt that this will carry on and expand with his new business endeavor.
Josephine S. Vitale, the President of BrightStar, is a prolific donor to charitable organizations, including the Four Diamonds Foundation, Paralyzed Veterans of America, The Marine Corps Foundation and The Luzerne Foundation, among others. Josie enjoys giving of herself as well and volunteers as a coach for youth track and field, cross county and cheerleading. Coach Josie never misses an opportunity to help make someone’s day just a little better and is known for offering free hugs. She cares deeply for everyone she meets and believes we should care about how we make people feel. Her passion for life, physical fitness and her fellow citizens is contagious and her positive approach to everything has been an asset in her philanthropic works. Josie was recruited by her Pastor to launch an annual gala to benefit the last remaining inner-city Catholic elementary school in Harrisburg. After a few short months, Josie had created a committee, set the date, picked the food, booked entertainment and had over 100 items donated for a silent auction. Josie eventually handed the gala committee off to a new chairperson but not until after she raised over $60,000. Her efforts directly impacted the decision to keep the school in the City. Josie has a passion for Triathlon and gives generously to the Ironman Foundation. The Foundation provides grants, resources, fitness opportunities and motivation to disabled individuals who want to participate in triathlons, mostly former military veterans who lost limbs in combat. Josie also believes in supporting women’s health initiatives and frequently contributes to charities supporting women’s healthcare. For years she has supported the YWCA of Harrisburg’s “Pursuit of Justice” Auction, an annual purse auction benefitting free legal services for women leaving abusive relationships. Josie enjoys mentoring women in the biotechnology sector and throughout her career has served in leadership roles in women’s leadership and development programs at Medtronic, GlaxoSmithKline, Johnson & Johnson and in her current role with Nevro.

Josh Genderson, COO of BrightStar, has made it his mission to make sure patients with serious medical conditions in the 4 other states with a legalized medical marijuana program where he operates have access to medical marijuana products regardless if they are poor, elderly or disabled. Josh’s will implement the same program with BrightStar as he has with his other company, Holistic Industries, and offer registered qualifying patients with verified financial hardship subsidized access to products and services on a sliding scale basis determined by need (potentially up to 100% off of retail prices.) To qualify for hardship subsidies, a patient completes a simple subsidy request form and submit proof of hardship, such as pay stubs, recent tax returns or SSI letters, which will be reviewed by staff who will ultimately decide the appropriate level of discount. Qualifying patients will have to renew their participation in the hardship program on an annual basis. Josh takes patient access very seriously and provides discounts on equipment needed to administer medications as well. In recognition of the diverse qualifying conditions, some of which are best addressed using vaporization as a means of administration, BrightStar will offers discounts and/or deferred payment plans for hardship program participants to purchase vaporizer equipment. Such equipment can be relatively expensive for the highest quality products, so we will take steps to assure affordability and access to these preferred medical devices. Josh will implement BrightStar’s access programs.

BrightStar’s General Manager, Martin K. Till, was a U.S. Army Green Beret and has served as a 13-year member of the Board of the Lehigh Valley Health Network, where he is currently serving as Vice Chairman Martin believes serving on the largest health systems Board provides
him with the unique opportunity to improve people’s lives through better healthcare options. Although not a doctor, Martin cares deeply about the health and well-being of his community and goes the extra mile to ensure that healthcare delivery system remains vibrant. Martin also serves on the All Spire Health Partners and the Easton Hospital Boards. Martin’s focus on creating family sustaining jobs and being generous with his time, talent and wealth is in keeping with the mission of BrightStar.

Alan Paynter, BrightStar’s Chief Diversity Officer, has made a life out of doing for others. Alan has been working with youth and families for over 20 years. Alan is a Director of Admissions at a highly selective liberal arts college in Pennsylvania and he spearheads the college’s diversity recruitment efforts. His desire to guide these students emerges from his own background. He is grandson of and raised by the late civil rights activist Ethel R. Lawrence who was responsible for what became known as the landmark NJ Supreme Court Mt. Laurel Decision which called for fair housing. She has been referred to nationally as the “Rosa Parks of affordable housing.” Her work for fairness and equality for those less fortunate was something that Alan could not escape. Alan is the product of a tough youth; his mother was a single parent who did not finish high school and eventually attempted to take her own life due to the pressures of trying to raise 3 sons with very little resources. Alan also founded Hershey Blaze Track Club four years ago because he saw a lack of youth sports opportunities. These track clubs serve over 300 youth athletes. Alan understands that track and field and cross country are great sports for youth with autism or intellectually disabilities. The Blaze coaches and club have accepted special needs athletes with open arms. Alan is a 20+ year member of Iota Phi Theta Fraternity, Inc., Victor Lodge #73 Prince Hall Masonic Lodge in Reading, Pa. and served on the board of directors of Camp Fire USA Adahi Council in Berks County.

Mike and Diane Molewski, owners and financial backers of BrightStar, are philanthropic giants in their community. They spend most of their free time serving others through their work promoting children's causes, access to higher education, pediatric healthcare and supporting nearly every charity imaginable. A common thread among the BrightStar team is the work ethic they developed as a result of growing up in poverty and working from an early age. These difficult beginnings have shaped these individuals’ passion for doing the most good. Mike is a graduate of King’s College in Wilkes Barre and credits the opportunity and education he received there to his success in business and as a result has spent years giving back to the College. Mike currently sits on the King’s College Board of Directors and previously served as Chair of the Fundraising and Institutional Advancement Committee where he led efforts to raise over $60 million dollars. Mike is Vice Chairman of the Board at Northampton Community College Foundation, one of the largest community college foundations in the country with over $45 million raised. Over the past several years Mike has spearheaded the Foundation’s efforts to raise at least $2.5 million per year. Not to be outdone, Diane chairs the United Way, Alexis de Tocqueville Society, the Lehigh Valley Wine Auction & Gala, and the Lehigh Valley Food & Wine Festival. Her efforts have raised over $4 million dollars to benefit local children’s charities such as the Children's Home of Easton over the past ten years. Mike and Diane are active member of the Pennsylvania Society and have made the lives of countless children, young adults and victims of abuse better through their efforts and they will continue to do more as leaders of BrightStar.
Samantha A. Edwards, an owner of BrightStar, is an owner of BrightStar. Sam, a teacher, takes every opportunity to motivate her students in a way that can only be described as inspirational. Sam has made it her personal mission to provide a safe and secure learning environment for her students free from bullying and she is certified in Bullying Prevention, Diversity and Inclusion. As a young girl, Sam, was injured in a life-threatening accident fracturing her pelvis and causing such massive internal trauma that physicians believed she would never walk again. With her innate perseverance and strong work ethic Sam pushed herself against all odds to become a tremendous athlete in multiple sports both in high school and college. She has spent her life volunteering in ways to help and protect children and encourage them to succeed against all odds, just like she did. Sam recently served as Executive Producer for a feature film about a 16-year-old girl living her life to the fullest as she embraces her terminal cancer diagnosis. Sam cares deeply for children and frequently volunteers and contributes to St. Jude’s Children's Hospital, the American Cancer Society and the Pediatric Cancer Foundation of the Lehigh Valley. Sam is an active volunteer and donor to the Pennsylvania Diversity Network and the Human Rights Campaign. She resides in the Lehigh Valley with her wife and two sons.

Sarah Edwards, an owner of BrightStar, has a heart of gold. She is a member of the United Way Tocqueville Society. Sarah helps steer United Way funds to Truth for Women, a women's resource center that serves as a homeless shelter for at-risk and sexually exploited women. Sarah also helps direct funds to the Children Home of Easton, a resource center for at-risk children from broken homes and at-risk for homelessness. The most impressive aspect of Sarah’s community engagement is her volunteerism. She is one of the most active volunteers at The Hillside School where she is a Board member and serves on the Investment Committee, Financial Committee and the Head Evaluation and Support Committee. The Hillside School is a school for students with language-based learning disabilities, such as dyslexia, dysgraphia and dyscalculia, as well as other disabilities that affect learning, including auditory and visual processing disorders, working memory deficits, ADHD, and sensory processing disorders. The nurturing environment of school fosters self-awareness, builds self-esteem and promotes self-advocacy skills for students to use throughout their lives. Sarah’s actions speak louder than her words.

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

**Partnerships**
As part of BrightStar’s commitment to its community it has developed strategic partnerships with several nonprofits and educational institutions in an effort to collaborate and cooperate in research, funding, education and access to products.

BrightStar has received the support of the Epilepsy Foundation Eastern Pennsylvania and will provide EFPA clients with resources, education and medications. BrightStar’s COO has developed a proprietary product specifically used to successfully treat intractable epilepsy in children. BrightStar will be the sole supplier of this product in Pennsylvania. EFPA serves individuals and families affected by epilepsy/seizure disorders in 18 counties and based on average epilepsy prevalence, over 110,000 patients may be in need of resources. Allison McCartin, CEO of the Foundation has written a letter supporting BrightStar’s application for a grower/processor permit.

The Pediatric Cancer Foundation of the Lehigh Valley is partnering with BrightStar to provide resources to children battling cancer and the families that support them. The Foundation services almost 200 families and often times the mental and emotional side effects of fighting pediatric cancer are overlooked. A study by CHOP found that 40% of parents with children fighting pediatric cancer suffer from PTSD and 25% of the children will eventually suffer from PTSD. BrightStar is partnering with this organization to raise awareness, educate, provide counseling, product access, fund research and otherwise care for children and families fighting cancer and its side effects.

As a woman and lesbian owned company, BrightStar is also partnering with the Bradbury-Sullivan LGBT Community Center. The partnership is based on education, community outreach and coordinated efforts to raise funds. The Center was created in 2014 out of a restructuring of the Pennsylvania Diversity Network. This is the pre-eminent LGBT political organization and they have led the effort to pass the expansion of Allentown’s non-discrimination law to include the LGBT, and subsequently helped pass similar laws in Easton, Reading and Bethlehem. The Center provides arts & culture, health promotion and youth programs as well as supportive services and a Training Institute to support the LGBT community. In April 2016, the Center, under the leadership of Adrian Shanker and Liz Bradbury, realized its vision for a community center to serve the areas vibrant and growing LGBT community. BrightStar is proud of the partnership is has forged with the Bradbury-Sullivan LGBT Community Center and Adrian Shanker.

BrightStar has also been in discussion with PTSD support groups at the Wilkes Barre VA and has agreed to provide them with medical marijuana educational materials. The generosity of BrightStar runs deep. BrightStar’s physicians have traveled to third world countries providing medical care to patients in need as well as missions to educate doctors and nurses. Collectively BrightStar has donated or lead fundraising efforts to raise tens of millions of dollars and volunteered for thousands of hours. We know BrightStar will deliver on its promise to be a good charitable neighbor and corporate citizen because we know where they have been and we know their actions speak louder than words.

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

King’s College and BrightStar have entered into an educational and research partnership. BrightStar has received the endorsement of King’s College President Father Ryan. Father Ryan wrote, “I know the founding partners of this company personally, one of which is a long-standing board member of the college, and I can attest to their high character, morals, faith, and commitment to their communities.” “Just as King’s has been dedicated to the Holy Cross ideal of transforming minds and hearts with zeal in communities of hope, BrightStar exemplifies this hope.” BrightStar will provide students with experiential learning opportunities and integrate students into executive workforce training roles with the goal of developing the industry leaders of tomorrow.

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

**Impact on Laurel Run**

Once BrightStar Biomedics is granted a permit under Act 16 of 2016, to operate a grower/processor facility in Laurel Run, the impact will be enormous. The current operating budget for the Borough is $138,000.00, BrightStar’s presence in the Borough will generate nearly $75,000 in year one and at least $50,000 thereafter. The Mayor and Council have wholeheartedly endorsed and embraced BrightStar. At the zoning hearing the President of Council gave an impassioned speech to the zoning board imploring them to approve BrightStar’s application for zoning approval. The approval was granted 3-0, most touching is the speech the Council President gave about her feelings on medical marijuana. She explained that her mother passed away from lung cancer and her mom was unable to eat due to the side effects of chemotherapy. She said she and her mom had planned to move to Delaware to access medical marijuana to reduce the side effects, before they could complete the move her mother passed.

She also stated without the new revenues from BrightStar she would be forced to significantly raise taxes as there are no more areas of the budget to cut. With the extra revenue, the Borough would be able to improve the health, safety and welfare of its citizens, including newly paved streets, better municipal equipment, improvement to the parks and community building, increase in snow removal efforts and accessible water. BrightStar plans to clean-up an old brownfield and breathe new life into the building that has been a community danger and
eyesore. Over 100 years ago the property was used to manufacture powder and dynamite. This location literally provided the means by which the coal mines powered the industrial revolution and won two world wars. Steep in history, this property will lead the next new innovation in biotech with BrightStar committing to be research and outcomes based.

In addition to the new tax revenue that will be generated, Laurel Run desperately needs jobs. The only employer is a spring water bottling facility which employs only a handful of locals. Many citizens have asked BrightStar to give residence preference in hiring and BrightStar has committed to hire and train these local citizens. BrightStar will create over 75 high paying jobs with healthcare and a 401k. BrightStar has been discussing its plans and strategy with the elected officials and the citizens since November 2016 and continues to engage the community. BrightStar is excited to become a major employer and generous partner with Laurel Run. The local support has been inspiring and BrightStar will not let the citizens of Laurel Run down.

Support from Local Municipalities and Officials:

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

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

Plymouth Mayor - The Mayor provided BrightStar with strong support and a letter of recommendation.

Plymouth Borough Council President - The Council President provided BrightStar with strong support and a letter of recommendation.

Hellertown Borough Council - This borough supports the project and supplied a letter of recommendation.

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

Support from State Officials:

Members of PA Senate

John Yudichak - Met with the Senator and his team and had multiple conversations to provide plan feedback and influence regarding specific needs of the communities he serves. They discussed their plan and strategy to develop a g/p facility within his district. Senator Yudichak was very supportive and he liked the fact that the founding partners of BrightStar are local veterans and woman who have deep family roots in NEPA. He has known several of the principles his entire life and he expressed how proud he was with BrightStar’s vision to produce
the most advanced marijuana products on the market in NEPA.

**Gene Yaw**- Met with the Senator and his team to discuss specific needs of the community he serves and nuances of the rural health care delivery model as well as impact of the opioid crisis and heroine epidemic.

**John Blake**- Met with the Senator and discussed the scope of the project, specifically focusing on complex care delivery models and the impact post-market outcomes surveys may have on the body of evidence for Medical Marijuana. Senator Blake was impressed with BrightStar’s plan to fund research partnership with health systems and educational institutions.

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

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

**Members of PA House of Representatives**

**Gerald Mullery**- Met with the Representative on multiple occasions regarding full scope of project as well as specific economic impact through job creation. He gave his complete endorsement to BrightStar and suggested they recruit employees from his district. Mullery represents two communities that recently emerged from Act 47, Nanticoke and Plymouth Township, and he wants BrightStar to be a regional partner. The CEO of BrightStar, Bob Vitale, grew up in Plymouth Township, attended Nanticoke High School and committed to help these struggling communities.

**Eddie Day Pashinski**- Met with Representative on several occasions to keep him appraised of the progress of project development and worked through him to address and provide education to the community on project scope. Rep. Pashinski has been extremely supportive of BrightStar’s plan to locate in Laurel Run because he is familiar with the dire economic situation facing the Borough, the lack of jobs in the community, and he would like to see the former industrial site be repurposed.

**Representatives Mark Rozzi and Tom Caltigirone**, members of the Northeast Delegation, both were impressed with the team and wrote a letter of support because they liked BrightStar’s unique ability to focus on patient outcomes, market development and care access strategies as well as a specific focus on deploying the most advanced security and anti-diversion personnel assembled in Pennsylvania.

**Kurt Masser**- Met with the Representative to discuss his community, which is centrally focused around Geisinger Health System. Discussed potential survey based research opportunities developed within our project scope and the importance of those research components.
David Millard- Met with Representative Millard to discuss his community in Columbia County. He had a specific focus on veterans and we further discussed the incorporation of veterans on our team as well as the focus on veterans within our business plan.

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

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

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

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

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

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

Gary Day- Met with Representative Day to provide an overview of the project and explain how the commercial strategy aligns to more traditional pharmaceutical products.
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>
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<tbody>
<tr>
<td>BrightStar BioMedics LLC_03202017_Grower-Processor_Principals, Financial</td>
<td>Principals, Financial Backers and Operators (contd.)</td>
<td>Additional Information</td>
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<td>Backers and Operators (contd.)</td>
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</tr>
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<td>Description of Duties and Training (contd.)</td>
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<tr>
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</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]

Principal

3/15/17

Title in Applicant's Business

Date

Robert Vitale

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]

Principal

3/15/17

Title in Applicant's Business

Date

Robert Vitale

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: [Signature]
Principal: [Principal]
Title in Applicant's Business: [Title]
Date: 3/13/17

Printed Name: Robert Vitale

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: |
| BrightStar BioMedics LLC |
| Trade names and DBA (doing business as) names: |
| N/A |
| Principal Business Address: 425 Spruce Street Ste. 200 |
| City: Scranton | State: PA | Zip Code: 18501 |
| Phone: DOH REDACTED | Fax: N/A | Email: DOH REDACTED |
TO ALL WHOM THESE PRESENTS SHALL COME, GREETING:

Brightstar Biomedics, LLC

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

Creation Filing filed on Jan 6, 2017 - Pages (2)

which appear of record in this department.

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

[Signature]
Secretary of the Commonwealth

Certification Number: TSC170220100062-1

Verify this certificate online at http://www.corporations.pa.gov/orders/verify.aspx

4. Strike out if inapplicable term
   A member's interest in the company is to be evidenced by a certificate of membership interest.

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

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

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

   __________________________________________________________

   __________________________________________________________

8. For additional provisions of the certificate, if any, attach an 8½ x 11 sheet.

IN TESTIMONY WHEREOF, the organizer(s) has (have) signed this Certificate of Organization this
6th day of January, 2017

[Signature]

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

Instructions:
- Attach one of the following:
  - Evidence of the applicant’s clear legal title to or option to purchase the proposed site and facility
  - A fully-executed copy of the applicant’s unexpired lease for the proposed site and facility and a written statement from the property owner that the applicant may operate a medical marijuana organization on the proposed site for, at a minimum, the term of the initial permit
  - Other evidence that shows that the applicant has a location to operate its medical marijuana organization
- Complete this cover sheet. Scan this sheet and the appropriate document(s) and save it as a PDF file called “Attachment C,” using the appropriate file name format.

Business Name, as it appears on the applicant's certificate of incorporation, charter, bylaws, partnership agreement, or other official documents:
BrightStar BioMedics LLC

Trade names and DBA (doing business as) names:
N/A

Principal Business Address: 425 Spruce Street Ste. 200

City: Scranton  State: PA  Zip Code: 18501
Phone: DOH REDACTED  Fax: N/A  Email: DOH REDACTED
SHORT-FORM LEASE AGREEMENT

BrightStar Biomedics, LLC (Tenant) with an address of 425 Spruce Street, Suite 200, Scranton, Pennsylvania 18503 and Laurel Run Lodge, LLC (Landlord) hereby enter into this binding Short-Form Lease to lease the property described below.

Premises: 3680 LAUREL RUN Road, LAUREL RUN, Pennsylvania 18706

Approximately two (2) acres of Tax Parcel Number: 39-110-00A-011-000

Use: The premises shall be used for Tenant’s operation of a medical marijuana grower/processor facility and no other use without the prior written consent of Landlord. Tenant shall at all times comply with Act 16 of 2016 and all regulations related thereto.

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

Lease Term: Initial term: Ten (10) years, with one (1), ten (10) year renewal option. Tenant shall have exclusive right to the premises for the duration of the application period for medical marijuana grower/processor permits under Act 16 of 2016. If Tenant is not awarded a permit to operate a medical marijuana grower processor organization within the Northeast Health District, this lease is null and void.

Holding Fee: $25,000.00 refundable holding fee to be delivered to the Landlord at the execution of this agreement.

Rents: Tenant shall incur all the costs to build the facility and Tenant shall not pay rents until the facility is operational. Since Tenant will incur substantial cost to renovate and expand the facility, rents shall never exceed eight ($8) dollars a square foot at any time. The facility shall be deemed operational and rent shall begin no later than 12 months from the date Tenant’s Approvals are received. The construction of additional square footage by the Tenant will be determined on the market and subject to change regardless of the pay to square footage in the schedule below are but the price per square foot shall remain the operational square footage. Once operational schedule below shall take effect.

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<th>Year</th>
<th>Sq. Ft.*</th>
<th>Per Sq. Ft.</th>
<th>Per Month</th>
<th>Per Annum</th>
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<td>$8.00</td>
<td>$33,333.33</td>
<td>$400,000.00</td>
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</table>

*SUBJECT TO CHANGE
Tenants

Construction: Time is of the essence with this project. Tenant shall begin and complete renovations and construction on the premises within twelve months of Tenant being awarded a grower/processor permit under Act 16 of 2016, or sooner if possible. Once Tenant is awarded a permit to operate a grower/processor facility on the premises, Tenant shall commence immediately the process of renovating the existing structure to the specifications agreed upon by the Landlord and Tenant. Tenant shall comply with all conditions required by local, county and state laws and regulations. Tenant will construct in the following manner: The existing structure must be renovated and completed within twelve months, if not sooner. Tenant shall have the right to expand the facility as the medical marijuana market matures. The build out of the second portion of the facility is subject to change based on the Tenants assessment of market need and how quickly the medical marijuana industry develops. If the market fails to warrant building the second portion within this timeframe, Tenant is not under any obligation to do so. Any work completed pursuant to this provision shall comply with all Laurel Run Borough and Luzerne County land development requirements as well as all applicable building codes. Tenant will take all necessary steps to complete the construction in a prudent and timely manner and all work shall be completed in a good and sound manner.

Commencement: Full rent and Term shall commence upon the facility being deemed operational or no later than 12 months from the date Tenant’s Approvals are received.

Utilities: All utilities, including, but not limited to, gas, electric, water, sewer, solar panel farm, geothermal and hydrothermal heating and cooling systems shall be the sole responsibility of the Tenant.

Taxes: Real estate taxes assessed on the Tenants facility shall be the sole responsibility of the Tenant.
Maintenance: Tenant shall perform all repairs, maintenance, and replacements to the Leased Premises, including but not limited to any structural repairs and maintenance, including the foundation or pad, roof, structural supports, and HVAC.

Assignment/Sublet: Tenant may assign or sublet the premises to any of its affiliated companies or another company approved to grow and process medical marijuana by the PA Department of Health so long as the new tenant agrees to and complies with all terms and conditions as set forth herein. Further any assignee or sublessee shall be required to execute any necessary documents in order to bind themselves to the terms of the fully executed lease. Landlord shall have the right to assign the rights and payments in this agreement and any subsequent lease agreement to Landlord’s heirs, successors and or assigns.

This Short-Form Lease agreement constitutes a binding commitment of the Parties with respect to the transactions contemplated hereby. The Parties intend to collaborate in the design, construction and development of the premises. The parties agree to draft a more detailed, long-form lease agreement once Tenant is awarded a permit to operate as a medical marijuana organization under Act 16 of 2016. The terms of such long-term lease agreement shall be derived from this Short-Form Lease and incorporated where possible.

Agreed & Accepted by Tenant:
By:
BrightStar Biomedics, LLC
Title: President
Date: 3/9/2017

Agreed & Accepted by Landlord:
By:
Laurel Run Lodge, LLC
Title: Member
Date: 3-9-17
I, Michael D. Molinski, on behalf of Laurel Run Lodge, LLC, hereby acknowledge that the Tenant under this agreement intends to operate as a permitted medical marijuana grower/processor in accordance with the requirements of Act 16 of 2016 (Pennsylvania Medical Marijuana Act) for the term of the lease, which exceeds the term of the Tenant's initial permit, at the property I own and lease to them located at 3680 Laurel Run Road, Laurel Run, Commonwealth of Pennsylvania 18706 (Tax Parcel#: 39-I10-00A-011-000).

Landlord: [Signature]

Date: 3-9-17
Attachment F: Affidavit of Business History

Instructions:

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

State of Pennsylvania )
 ) ss:
County of Northampton )

The undersigned, Robert Vitale, 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>
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</thead>
<tbody>
<tr>
<td>Josh Genderson</td>
<td>Principal</td>
<td>Holistic Remedies LLC 308 Massachusetts Ave NE Washington DC 20002</td>
<td>Owner/Manager</td>
<td>2011-present</td>
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<tr>
<td></td>
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<td>Organic Wellness LLC 308 Massachusetts Ave NE Washington DC 20002</td>
<td></td>
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</tr>
<tr>
<td></td>
<td></td>
<td>Holistic Industries, Inc. 33 State Street Springfield, MA 01103</td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td>Holistic Industries, LLC 7311 Montrose Rd, Ste 200 Potomac, MD 20854</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Joshua Kahn</td>
<td>Advisory Board</td>
<td>Takoma Wellness Center LLC 6925 Blair Rd NW Washington DC 20001</td>
<td>Owner/Manager</td>
<td>2011-present</td>
</tr>
</tbody>
</table>

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

[Signature]
Signature of Affiant and Title

[Date]
Date
Sworn to and subscribed before me this 15 day of March, 2017.

[Signature]
Notary Public

MY COMMISSION EXPIRES: April 2, 2019

COMMONWEALTH OF PENNSYLVANIA

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

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

Instructions:

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

State of Pennsylvania

County of Northampton

The undersigned, Robert Vitale, hereby certifies the following by checking the boxes below:

Principal(s):

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

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

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

Name(s): __________________________________________

Offense(s): _________________________________________

Operator(s):

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

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

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

Name(s): __________________________________________

Offense(s): _________________________________________

Financial Backer(s):

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

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

Name(s): ________________________________
Offense(s): ______________________________

[Signature]
Signature of Affiant and Title

3/15/17
Date

Sworn to and subscribed before me this 15 day of March, 2017.

[Signature]
Notary Public

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

MY COMMISSION EXPIRES: April 2, 2019

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

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

COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF HEALTH

AFFIDAVIT OF CAPITAL SUFFICIENCY

State of Pennsylvania
County of Northampton

I/WE Robert Vitale

For the following applicant:

BrightStar BioMedics LLC
NAME OF BUSINESS

425 Spruce Street Ste 200
ADDRESS

Scranton PA 18501 Lackawanna
CITY STATE ZIP CODE COUNTY

hereby certify that the Applicant named has at least $2,000,000 in capital, $500,000 of which is on deposit with one or more financial institutions, as follows (capital may include cash or securities, real estate, or other assets):
<table>
<thead>
<tr>
<th>Type of Capital</th>
<th>Source of Capital</th>
<th>Total Value of Capital</th>
<th>Value not encumbered by debt or other obligations</th>
<th>If on deposit, name and address of financial institution</th>
<th>If on deposit, account number</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

**DOH Redacted**
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

[Date]
Date

Sworn to and subscribed before me this ___ day of ___ , 20___.

[Signature]
Notary Public

MY COMMISSION EXPIRES: ___ , 20___

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

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

<table>
<thead>
<tr>
<th>Business Name, as it appears on the applicant's certificate of incorporation, charter, bylaws, partnership agreement or other official documents:</th>
<th>BrightStar BioMedics LLC</th>
</tr>
</thead>
<tbody>
<tr>
<td>Trade names and DBA (doing business as) names:</td>
<td>N/A</td>
</tr>
<tr>
<td>Principal Business Address: 425 Spruce Street Ste. 200</td>
<td></td>
</tr>
<tr>
<td>City: Scranton</td>
<td>State: PA</td>
</tr>
<tr>
<td>Phone: DOH REDACTED</td>
<td>Fax: N/A</td>
</tr>
</tbody>
</table>
**BrightStar Biomedics**

### Medical Marijuana Liquid Spray

**Dosage**
- **EQUAL:** 3.0mg THC
- **THC/CBD:** 3.0mg CBD per 15ml

**Cannabinoid Profile**
- **THC:** 3.0% ± 1%
- **CBD:** 0.004 ± 1%
- **THCA:** 0.005 ± 1%
- **THCV:** 0.01 ± 1%
- **CBDA:** 0.01 ± 1%
- **CBNV:** 0.01 ± 1%
- **CBG:** 0.01 ± 1%
- **CBN:** 0.01 ± 1%
- **CNE:** 0.01 ± 1%

**Product Information**
- **Expiration Date:** 02/10/2022
- **Lot:** 01N02054
- **Packaging:** 12 FL oz (354ml)
- **Shipped:** YANOC7-489

**Warnings**
- This product is for medicinal use only. Women should not consume during pregnancy or while breastfeeding except on the advice of the practitioner and, in the case of breastfeeding, the infant’s pediatrician. This product might impair the ability to drive or operate heavy machinery.
- **Keep Out of Reach of Children.**
- Medical marijuana must be kept in the original container in which it was dispensed.
- Unauthorized use is unlawful and will subject the purchaser to criminal penalties.
- Keep stored at room temperature, with the lid closed and seconded, and out of direct sunlight.

**Ingredients**
- Extracted Medical Marijuana, Fracoholated Coconut Oil MCT
- Polyethylene-40 (USP)
- Ethanol (USP)

---

**BrightStar Biomedics**

### Medical Marijuana Oil

**Dosage**
- **10.0 mg THC per 15ml**
- **20mg CBD per 15ml**

**Cannabinoid Profile**
- **THC:** 1.0% ± 1%
- **CBD:** 0.004 ± 1%
- **THCA:** 0.005 ± 1%
- **THC:** 0.01 ± 1%
- **CBDA:** 0.01 ± 1%
- **CBNV:** 0.01 ± 1%
- **CBG:** 0.01 ± 1%
- **CBN:** 0.01 ± 1%
- **CNE:** 0.01 ± 1%

**Product Information**
- **Expiration Date:** 02/02/2022
- **Lot:** 01N02054
- **Packaging:** 8 FL oz (236ml)
- **Shipped:** YANOC7-489

**Warnings**
- This product is for medicinal use only. Women should not consume during pregnancy or while breastfeeding except on the advice of the practitioner and, in the case of breastfeeding, the infant’s pediatrician. This product might impair the ability to drive or operate heavy machinery.
- **Keep Out of Reach of Children.**
- Medical marijuana must be kept in the original container in which it was dispensed.
- Unauthorized use is unlawful and will subject the purchaser to criminal penalties.
- Keep stored at room temperature, with the lid closed and seconded, and out of direct sunlight.

**Ingredients**
- Extracted Medical Marijuana, Glycerine (USP), Propylene Glycol (USP), Sucrose, Vitamin E Polyethylene Glycol Sucrate (USP), Ethanol (USP)

---

**BrightStar Biomedics**

### Medical Marijuana Pills

**Dosage**
- **EQUAL:** 25mg THC
- **THC/CBD:** 25mg CBD per capsule

**Cannabinoid Profile**
- **THC:** 0.01 ± 1%
- **CBD:** 0.004 ± 1%
- **THCA:** 0.005 ± 1%
- **THCV:** 0.01 ± 1%
- **CBDA:** 0.01 ± 1%
- **CBNV:** 0.01 ± 1%
- **CBG:** 0.01 ± 1%
- **CBN:** 0.01 ± 1%
- **CNE:** 0.01 ± 1%

**Product Information**
- **Expiration Date:** 02/10/2022
- **Lot:** 01N02054
- **Packaging:** 16 capsules

**Warnings**
- This product is for medicinal use only. Women should not consume during pregnancy or while breastfeeding except on the advice of the practitioner and, in the case of breastfeeding, the infant’s pediatrician. This product might impair the ability to drive or operate heavy machinery.
- **Keep Out of Reach of Children.**
- Medical marijuana must be kept in the original container in which it was dispensed.
- Unauthorized use is unlawful and will subject the purchaser to criminal penalties.
- Keep stored at room temperature, with the lid closed and seconded, and out of direct sunlight.

**Ingredients**
- Extracted Medical Marijuana, HPMC Capsule, Microcrystalline Cellulose, Sodium Starch Glycolate
MEDICAL MARIJUANA TINCTURE

12 FL oz (354ml)

Grower/Processor: BrightStar Biomedics, LLC
1227 N River Street
Wilkes-Barre, PA 18702
Permit #1376-1893

Dispensary: BrightStar Biomedics, LLC
44 Green Ridge Street
Scranton, PA 18509
Permit #3890-1076

DOSAGE

EQUIL 5.0mg THC

THC/CBD 5.0mg CBD per 15ml

CANNABINOID PROFILE

THC : 1.05%
CBD : 0.04%
THCA : 0.035%
THCV : 0.3%
CBGA : 0.1%
CBDA : 0.1%
CBG : 0.1%
CBG : 0.1%

PRODUCT INFORMATION

Expiration Date: 02/20/2018
Harvest Batch: 10509299
Process Lot: OPC09091
Packaged On: 02/02/2017
Packaged By: TSTHACC-221
Shipped By: XAMC7-489

WARNINGs

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

KEEP OUT OF REACH OF CHILDREN.

Medical marijuana must be kept in the original container in which it was dispensed.

Unauthorized use is unlawful and will subject the purchaser to criminal penalties.

Keep stored at room temperature, with the lid closed and seconded, and out of direct sunlight.

INGREDIENTs

Extracted Medical Marijuana, Fractionated Coconut Oil MCT (Glycerol Pentaerythritol Tetraacetate) (GPE-TA) and Ethanol (111F)

Dimensions: 2.5" x 6.75"

MEDICAL MARIJUANA TOPICAL CREAM

12 FL oz (354ml)

Grower/Processor: BrightStar Biomedics, LLC
1227 N River Street
Wilkes-Barre, PA 18702
Permit #1376-1893

Dispensary: BrightStar Biomedics, LLC
44 Green Ridge Street
Scranton, PA 18509
Permit #3890-1076

DOSAGE

EQUIL 5.0mg THC

THC/CBD 5.0mg CBD per 15ml

CANNABINOID PROFILE

THC : 1.05%
CBD : 0.04%
THCA : 0.035%
THCV : 0.3%
CBGA : 0.1%
CBDA : 0.1%
CBG : 0.1%
CBG : 0.1%

PRODUCT INFORMATION

Expiration Date: 02/12/2017
Harvest Batch: 10509299
Process Lot: OPC09091
Packaged On: 02/02/2017
Packaged By: TSTHACC-221
Shipped By: XAMC7-489

WARNINGs

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

KEEP OUT OF REACH OF CHILDREN.

Medical marijuana must be kept in the original container in which it was dispensed.

Unauthorized use is unlawful and will subject the purchaser to criminal penalties.

Keep stored at room temperature, with the lid closed and seconded, and out of direct sunlight.

INGREDIENTs

Astragalus Root, Ginseng Root, Ledebouria Root, Angelica, Oil Berry, Artemisia, Cassia Seed, Schisandrae

Dimensions: 2.5" x 6.75"

MEDICAL MARIJUANA TOPICAL GEL

12 FL oz (354ml)

Grower/Processor: BrightStar Biomedics, LLC
1227 N River Street
Wilkes-Barre, PA 18702
Permit #1376-1893

Dispensary: BrightStar Biomedics, LLC
44 Green Ridge Street
Scranton, PA 18509
Permit #3890-1076

DOSAGE

EQUIL 5.0mg THC

THC/CBD 5.0mg CBD per 15ml

CANNABINOID PROFILE

THC : 1.05%
CBD : 0.04%
THCA : 0.035%
THCV : 0.3%
CBGA : 0.1%
CBDA : 0.1%
CBG : 0.1%
CBG : 0.1%

PRODUCT INFORMATION

Expiration Date: 02/13/2017
Harvest Batch: 10509299
Process Lot: OPC09091
Packaged On: 02/02/2017
Packaged By: TSTHACC-221
Shipped By: XAMC7-489

WARNINGs

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

KEEP OUT OF REACH OF CHILDREN.

Medical marijuana must be kept in the original container in which it was dispensed.

Unauthorized use is unlawful and will subject the purchaser to criminal penalties.

Keep stored at room temperature, with the lid closed and seconded, and out of direct sunlight.

INGREDIENTs

Astragalus Root, Ginseng Root, Ledebouria Root, Angelica, Oil Berry, Artemisia, Cassia Seed, Schisandrae

Dimensions: 2.5" x 6.75"
**DOSAGE**

**MEDICAL MARIJUANA TOPICAL OINTMENT**

**12 FL oz (354ml)**

**Grown/Processor:** BrightStar Biomedics, LLC
3227 N River Street
Wilkes-Barre, PA 18702
Permit #3796-1893

**Dispensary:** BrightStar Biomedics, LLC
44 Green Ridge Street
Scranton, PA 18509
Permit #3860-1076

**WARNINGs**

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

**KEEP OUT OF REACH OF CHILDREN.**

Medical marijuana must be kept in the original container in which it was dispensed.

Unauthorized use is unlawful and will subject the purchaser to criminal penalties.

Keep stored at room temperature, with the lid closed and secured, and out of direct sunlight.

**INGREDIENTS**

Astragalus Root, Ginseng Root, Ledebourella Root, Angelica, Big Berry, Artemisia, Cassia Seed, Schisonepeta.

---

**DOSAGE**

**MEDICAL MARIJUANA VAPORIZATION CARTRIDGE**

**12 FL oz (354ml)**

**Grown/Processor:** BrightStar Biomedics, LLC
3227 N River Street
Wilkes-Barre, PA 18702
Permit #3796-1893

**Dispensary:** BrightStar Biomedics, LLC
44 Green Ridge Street
Scranton, PA 18509
Permit #3860-1076

**WARNINGs**

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

**KEEP OUT OF REACH OF CHILDREN.**

Medical marijuana must be kept in the original container in which it was dispensed.

Unauthorized use is unlawful and will subject the purchaser to criminal penalties.

Keep stored at room temperature, with the lid closed and secured, and out of direct sunlight.

**INGREDIENTS**

Extracted Medical Marijuana and Fractionated Coconut Oil MCT (EP)
Attachment K: Release Authorization

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

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

FROM: BrightStar BioMedics LLC
Applicant's Name

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

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

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

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

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

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

4. This Release Authorization extends to the review and copy of any information protected by law or contact from disclosure, privilege or obligation.

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

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

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

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

IN WITNESS WHEREOF, I have executed this Release on this 15 day of March, 2017.

[Signature]
Authorized Signatory

STATE OF Pennsylvania )
COUNTY OF Northampton ) ss:

On this 15 day of March, 2017, before me, a Notary Public, personally appeared

[Signature] Robert Vitale (known to me or satisfactorily proven) to be the person whose
name is subscribed in this Release, and acknowledged that he/she executed the same for the purposes
herein contained.

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

[Signature]
Notary Public

MY COMMISSION EXPIRES: April 2, 2019
Attachment L: Applicant Priorities for Multiple Applications

Instructions:
- This attachment is for applicants who are submitting multiple medical marijuana organization permit applications. Use this attachment to indicate your priorities for which medical marijuana regions or counties you prefer for issuance of a permit. Not providing Attachment L as part of your medical marijuana organization permit application indicates that you have no preference.
- If you submit this form more than once, the last form the Department receives will represent your prioritization. This form cannot be submitted without being part of an application.
- If you elect to submit this attachment, please scan the completed form and save it as a PDF file called "Attachment L," using the appropriate file name format.

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

Trade names and DBA (doing business as) names:
N/A

Principal Business Address: 425 Spruce Street Ste. 200

City: Scranton State: PA Zip Code: 18501
Phone: REDACTED Fax: N/A Email: DOH REDACTED

A. Priorities for Multiple Grower/Processor Permit Applications

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

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

Please check one of the following:

☐ The applicant would like to make the Department aware of the applicant's priorities as listed below
☐ The applicant has no preference regarding county

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

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

Bob Vitale, CEO: Our CEO will be responsible for implementing our company’s vision throughout all of our facilities. They will work directly with the executive and departmental management team.

Josie Vitale, President: Our President will oversee all aspects of the business, both corporate and operational and will ensure compliance with the law and our standard operating procedures. The President will interact with the Department of Health and other government officials and will oversee our strategic relationships with healthcare and university partners.

Josh Genderson, COO: Our COO will oversee all cultivation and processing operations to ensure they comply with standard operating procedures. They will also oversee testing and transportation procedures and every other operational aspect of the business.

Joe Salvemini, Head of Diversion Control: This position will work hand-in-hand with the security department to prevent diversion of plants and products at the facility. The position will also assist in creating secure product transportation procedures and conducting diversion investigations.

Mike Edminston, VP Legal and Compliance: This position will ensure regulatory compliance with state law and regulations and will interact with government officials. The position will also handle and legal matters that should arise.

Martin Till, General Manager: Our General Manager will act as the main director for our day-to-day operations and will ensure that all systems and departments are working effectively. Our General Manager will be responsible for overseeing our departmental managers and will supervise every aspect of production.

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

Mark Li, Chief Medical Officer: This position will work with the company’s healthcare and research partners. Advise and oversee clinical impact of operations. Additionally, this position will ensure the health and safety of all personnel and will ensure the company operates in accordance with its medical mission.

Adam Kavalier, Chief Scientific Officer: This position will oversee all processing, infusion and testing operations, including the safe use of extraction equipment. The position will oversee new production processes and new product development.
Alan Paynter, Diversity and Inclusion Officer: This position will oversee the creation, improvement and implementation of our Diversity Plan, as well as affirmative action plan and answer directly to CEO.

Teresa Winslow, Head Pharmaceutical Standards, QC Manager: This position will ensure all operations meet strict pharmaceutical manufacturing standards and all products meet internal standards for excellence and safety. The position will ensure all processes are conducted according to protocol and that all products produced are safe for patient consumption.

Megan Shank, VP Sales: Our VP Sales will negotiate and secure purchase agreements from permitted dispensaries and will oversee the business relationships with our customers as well direct sales teams.

Ron Furiato, Security Manager: Our Security Manager will oversee the entire security system for our facility and will also work alongside any of our security contractors. They will aim to identify and avert any form of diversion, theft, or mishandling of medical marijuana. Our Security Manager will also oversee the safety of the facility, employees and visitors.

Vince Canales, VP Security: Responsible for overseeing all security projects and processes including facility, production, inventory, as well as cyber security and intellectual property.

Michelle Zenie, Advisory Board: This position will provide general guidance and oversight to the executive team to ensure we exceed regulatory and customer expectations.

Josh Kahn, Advisory Board: This position will provide advice and guidance to the executive team with regards to medical marijuana and dispensary relations.

Farooq Quershi, Clinical Program Director: This position will facilitate the company’s business relationship with our research partners. Facilitate professional clinical education efforts.

Rev. Katie Day, Advisory Board: This position will provide advice and guidance to the company to ensure we meet community and state expectations as clean operators.

Sam Edwards, Owner: The owner will not be involved in grower/processor operations at this time.

Sarah Edwards, Owner: The owner will not be involved in grower/processor operations at this time.

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

Dona Hall, Owner: The owner will not be involved in grower/processor operations at this time.

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

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

**ROBERT VITALE, CPA:**

Bob Vitale brings 20 years of executive, operational and financial leadership to BrightStar. He is the President and CEO of Horizon Facility Services (and its subsidiaries MLS and PMC) a national company in scale and size with more than 3,000 employees operating in 20 states. Bob started Horizon Facility Services with his co-founder less than 7 years ago as only a two-employee company. Today the companies operate in one of the most complex logistical environments all while providing services to some of the largest companies in the world. Prior to founding Horizon Facility Services Bob served in several Executive Leadership positions and has held the following titles CEO, President, COO, & CFO with major U.S. and international companies. Bob has been an integral part of starting, leading, and executing strategy on several startups and growth based businesses. His experienced is focused in business services, manufacturing, logistics, and distribution as well as financial services. The combination of this experience will serve BrightStar well during its startup and execution phases. Bob grew up in West Nanticoke, Pennsylvania and earned his accounting degree from King’s College in Wilkes-Barre, Pennsylvania. Bob utilized his accounting degree from King’s and CPA certification to launch his professional career with some of the most prominent accounting and consulting firms in the world, including, KPMG. Bob is also a veteran of the United States Marine Corps where he earned the prestigious Navy and Marine Corps Achievement Medal. Lastly, Bob serves civically in many ways including sitting on a non-profit school board focused on educating children with learning disabilities.

**JOSEPHINE VITALE:**

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

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

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

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

JOSH GENDERSON:

Josh Genderson serves as the President and CEO of successful medical marijuana operations in Massachusetts, Maryland and the District of Columbia. The foundation of the grow and process facilities that Josh owns are built upon two basic principles: 1) Provide the highest possible quality medical cannabis finished products, with a focus on high CBD medicine designed for some of the most sensitive patients – children suffering from severe epilepsy; and 2) Offer these top quality products at the lowest possible price for the customer.

The political support of representatives of both the State Senate and Hampton, Middlesex and Prince George’s County Governments demonstrate public confidence in each of Josh’s companies and will be an asset in establishing and operating the dispensaries in each region and throughout the expansion throughout new and existing markets. Josh is committed to the economic and social development of communities in which he takes on business, and creates hundreds of local jobs that offer health insurance, profit-sharing, and 401K plans. He recognizes that this is not only a civic responsibility, but good business, as a stable and committed workforce is the backbone of a successful business – especially one as sensitive and as highly regulated as medical cannabis.
Josh’s team is comprised of the nation’s most knowledgeable experts in medical dispensing, along with experts in security, agriculture, real estate, and the legal distribution of other highly regulated control substances (ie, wine and spirits). His leadership team includes medical professionals, public servants, thought leaders, investors, and one of the most established agricultural companies in Maryland.

Josh has the well-earned reputation as one of the youngest leaders in medical cannabis whose experience is exclusively in highly regulated medical markets. Holistic Remedies LLC and Organic Wellness LLC are two of the top licensed grower/processor facilities in Washington DC, home of one of the country’s most highly regulated medical cannabis programs. Under his tenure, both licensees have become DC’s only operators to cultivate and manufacture high CBD medical cannabis products designed specifically to help qualifying children-patients suffering from seizures and associated symptoms. Both companies have flawless compliance records, boast strong relationships with program regulators and the Metropolitan Police Department, and have consistently supplied safe, high-quality medical-grade cannabis products to more than 4,200 registered patients. Neither facility has suffered a crop failure nor large-scale pest/disease infiltration; they lead the program in the consistent supply of top quality medicine. As GM of these well respected companies, Josh was asked to consult with the District’s Department of Health to help refine its program rules and regulations.

JOSEPH P. SALVEMINI:

Joseph P. Salvemini served 31 years with the United States Department of Justice, Drug Enforcement Administration finishing his career as the Chief of the Southwest Boarder Operations, Special Operations Division. Mr. Salvemini began his career as a Special Agent in 1968 working out of the New York Regional Office conducting undercover narcotics cases against organized crime targets. He quickly became Group Supervisor in the New York Regional Office supervising undercover narcotic officers and was then transferred to Chicago to supervise O’Hare Airport Operations where he managed and develop all drug enforcement operations. Mr. Salvemini developed the Domestic Profile Interdiction Program for the DEA that became the National Model.

By 1981, he was elevated to the Assistant Special Agent in Charge of the Detroit Field Division where he was responsible for management of all DEA field operations in the states of Michigan, Ohio, West Virginia and Kentucky. Mr. Salvemini was responsible for 26% of all heroin arrests in the country and established the Metro Detroit Narcotics Task Force to help with the war on drugs declared by President Reagan. After 16 years and deployments around the world, Mr. Salvemini was assigned to DEA Headquarters, Washington D.C. During his tour at DEA Headquarters, Mr. Salvemini served as Agency Liaison to the Department of Defense and the Joint Chiefs of Staff as well as serving as the Deputy Chief of the Cocaine Investigations Section where he lead Operation Snowcap and Para-Military Operations in Latin America. He also served as a member of the Board of Professional Conduct investigating Agency integrity violations and was responsible for Agency security worldwide.
In June 1990 Mr. Salvemini was named Special Agent in Charge of the Fort Lauderdale District Office of the DEA. The Fort Lauderdale District Office covers the seven-county area of South Florida, an area known as the epic-center of the illegal drug trade from Latin America. In this role Mr. Salvemini was responsible for managing all enforcement, administration and budget programs and oversee a staff of 156, including military and intelligence personnel. He also established the Southeast Florida Regional Task Force and his leadership resulted in the Fort Lauderdale Office leading the nation in asset seizures, per-capita arrests and an overall dramatic increase in productivity.

Since retiring from the DEA in 1999, Mr. Salvemini has not left the law enforcement community and he has been serving as Director of Security for several world class healthcare institutions in New York City. As a Security Director in the private sector, he has significant experience in overseeing the installation and operations of CCTV and surveillance systems, developing threat assessments, designing security facilities, supervising construction of new central security facilities, developing emergency management and evacuation plans, established screening protocols to prevent elder abuse, and is responsible for the development of a propriety active shooter plan and training program.

Mr. Salvemini earned a Bachelor’s of Arts degree from Hofstra University and graduated from the Southern Police Institute at the University of Louisville. Additionally, he has significant training, including Dignitary Protection (CIA), Advanced Physical Security (U.S. Department of State), Command Officer Management Development (Michigan State University), Dynamics of International Terrorism (U.S. Air Force Special Operations School), Internal Affairs Investigations (DEA), Computer Security Systems (NSA), Controlled Substances Conspiracy Development and Asset Removal (DEA), Fire Safety Directors Course (John Jay College of Criminal Justice), Certified Security Guard Instructor (NY Division of Criminal Justice Services) and Sexual Harassment Investigations (Institute for International Research, NY).

Mr. Salvemini has spent his career protecting the citizens of the United States from the drug cartels importing illegal drugs into this country and will continue to work tirelessly to keep legal and illegal drugs out of the hands of children. His experience and expertise will bring comfort to the citizens of Commonwealth of Pennsylvania knowing that a superiorly qualified career law enforcement agent who lead the war on drugs is now preventing any diversion in the medical marijuana operations of BrightStar Biomedics, LLC. Mr. Salvemini was born in Brooklyn, New York and has been married to his wife Mary for 43 years. They have three daughters, one son and six grandchildren.

MICHAEL P. EDMISTON:

Pennsylvania's legalization of medical marijuana manufacture and distribution provides me a custom tailored opportunity to use the skills and experience I developed over six years with the Pennsylvania Gaming Control Board (from the earliest days of its formation and through issuance of the initial gaming licenses and subsequent regulation of licensees). During that time I proposed and implemented regulations establishing the Bureau of Hearings and Appeals and related procedures and presided over and wrote reports and recommendations of administrative
hearings for gaming and non-gaming employee registration permit applications and emergency suspensions and presided over public input hearings on applications for casino licenses.

In addition to my involvement with regulation of the casino gambling industry in Pennsylvania I have had a broad array of regulatory responsibilities during the forty-one years I have been licensed to practice law. Below are listed a few of them.


When the Pennsylvania Ethics Act was initially amended to include extensive regulation of the industry of lobbying government, I was a member of the Pennsylvania House of Representatives' legal team that worked with the staff of the State Ethics Commission on the development of initial implementing regulations and legislator/staff education on the regulations. A sampling of the issues involved in that effort included: delineating the differing responsibilities for public official and lobbyist reporting, defining the terms “gift,” “hospitality” and “conflict of interest.” (I also was a presenter at a Pennsylvania Bar Institute continuing legal education program on the Act and the evolving regulations. In my capacities as chief counsel/director of legislation for the Majority Floor Leader and General Counsel to the Minority Leader in the Pennsylvania House of Representatives I had responsibility for coordination of caucus leadership policy positions and the disposition of proposed regulations by the twenty-two standing committees of the House.

While chief counsel to the Pennsylvania House of Representatives Judiciary Committee, I had management responsibilities over proposals by the Office of Attorney General and the Pennsylvania State Police. Among those regulatory issues and industries were those that included practices involving the law enforcement and public safety areas of wiretapping and firearms licensing. During that time I also had responsibility to direct the development of and advance committee disposition of legislation (including writing of statutory amendments) concerning the Office of District Attorney, the Pennsylvania Crimes Code, Pennsylvania sentencing procedures and guidelines and Pennsylvania constitutional amendments concerning the disciplining of personnel in the Judicial Branch of state government. I also was appointed by the House Majority Leader as caucus designee to the Statewide Implementation of Automation of the State Courts and in that capacity reviewed and evaluated bids submitted in response to official Requests for Proposals (RFP’s) for automation of the District Justice Courts of the Commonwealth and the Philadelphia Traffic Court.

MARTIN K. TILL:

Martin K. Till serves as the Regional President for J.G. Petrucci Co., Inc. the premier Development and Design/Build firm in the Lehigh Valley and New Jersey. Before joining J.G. Petrucci Company, Martin served as President of Penn Jersey Advance and CEO, President and
Publisher of The Express-Times and lehighvalleylive.com for 14 years. He currently serves as Vice-Chair of the Lehigh Valley Health Network Board of Trustees, a $3 billion regional healthcare network.

Martin brings over 20 years of experience in innovative and successful manufacturing, process improvement, sales & marketing, lean initiatives and new product development. He also serves on the Health Network Laboratories Board, a for-profit multi regional system of laboratories and serves on the Lehigh Valley Partnership board, comprised of the region's leading CEO's and Top Executives to improve the quality of life in the Lehigh Valley.

Martin was a founding member of Team Capital Bank (now Provident Bank). He has served on the boards of: Lafayette Ambassador Bank, United Way of the Greater Lehigh Valley, Minsi Trails Boy Scouts, Lehigh Valley Economic Development Corporation, Lehigh Valley Chamber of Commerce, Easton Children’s Home, Easton Hospital and the Pennsylvania Newsmedia Association. Martin is a veteran having served in the U.S. Army and he currently lives in Coopersburg, PA with his wife Tiffany and his two children, MacKenzie and Austin.

**TOM HALL, CPA:**

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

**MARK LI, M.D. PH.D.:**

P. Mark Li, M.D., Ph.D. is the Chief of Neurosurgery at Lehigh Valley Health Network and a professor of Neurosurgery at Penn State University/Milton S. Hershey Medical Center. Dr. Li is also Co-Director for Neurosciences at LVHHN, managing large multidisciplinary programs including Neuro Critical Care, Neuro-oncology, Advanced Spine Center, Comprehensive Stroke Center, and Neuro Trauma. Prior to joining Lehigh Valley Health Network Dr. Li was an Assistant Professor of Neurosurgery and Assistant Attending Surgeon at the Weill Medical College of Cornell University and the New York Presbyterian Hospital.
Dr. Li’s academic career began at Yale University where he earned a B.S. in Molecular Biophysics and Biochemistry and prior to attending medical school earned his Ph.D. from the California Institute of Technology. Dr. Li is a Harvard Medical School honors graduate where he did his Postdoctoral Fellowship in Biochemistry and Molecular Pharmacology. Dr. Li completed his residency in neurological surgery at the New York Hospital - Cornell Medical Center and served as a guest investigator in Developmental Neurobiology at Rockefeller University Hospital in New York City. While at Rockefeller University he researched Fetal transplantation methods for analyzing neuronal development and while at Harvard he researched Structure-function relationships in LIM motifs.

Dr. Li’s is a national key opinion leader among neurosurgeons and biochemists and his body of publications and presentations is extensive, including publications on The LIM Region of a Presumptive C. Elegant Transcription Factor is an Iron-Sulfur and Zinc-Containing Metallodomain; Cytochrome c oxidase: Understanding nature’s design of a proton pump; Resonance Raman studies of CuA-modified cytochrome oxidase; Electron transfer between cytochrome a and Copper A in cytochrome c oxidase: A perturbed equilibrium study; Chemical Modification of the CuA Site Affects the Proton Pumping of Cytochrome c Oxidase; Heat treatment of Cytochrome c Oxidase Perturbs the CuA Site and Affects Proton Pumping Behavior; A Proposal for the Site and Mechanism of Proton Pumping in Cytochrome c Oxidase; Extended X-ray Absorption Fine Structure in CuA-depleted, pHMB-modified and Native Cytochrome c Oxidase; Effect of the 17- and 23-kDa Polypeptides, Calcium and Chloride on Electron Transfer in PSII, among many others.

Dr. Li’s publications are too numerous to include, some of the more recent publications are: Cerebral activation during Vagus Nerve Stimulation: A Functional MRI Study, published in Epilepsia; Use of admission Glasgow Coma Score, pupil size, and pupil reactivity to determine outcome for trauma patients; Outcome after decompressive craniectomy for the treatment of severe traumatic brain injury; Odontoid fractures in the elderly: should we operate?; Transcranial Electric Notor Evoked Potential Monitoring During Spine Surgery; Cystic Brain Metastasis in NSCLC Harboring EML4-ALK Translocation after Treatment with Crizotinib. Dr. Li has written extensively including a chapter in Spine and spine injuries. In: Cameron JL, ed. Current Surgical Therapy, 9th ed. and has been an invited speaker all around the world. Some of the most relevant speeches he has given are Vagus Nerve Stimulation: A New Surgical Therapy for Epilepsy; Operating in Eloquent Areas and Using Evidence-Based Practice to Develop a Pediatric Head Injury Protocol, among others.

Dr. Li is an active member of the American Board of Neurological Surgery, the Association of Neurological Surgeons, the Congress of Neurological Surgeons, American College of Surgeons and the Pennsylvania Medical Society. He has earned the New York Society for Neurosurgery Research Award, the Helen Hay Whitney Postdoctoral Fellowship, Josephine de Karman Trust Research Fellowship, the European Molecular Biology Organization Fellowship – Helsinki, Finland, the Samuel Talbot Travel Fellowship (Biophysical Society), the National Science Foundation Pre-Doctoral Fellowship in Chemistry and the Yale University Science and Engineering Association Fellowship.
Dr. Li find enjoyment is fly fishing, building boats, rock climbing, running, cycling and is a rabid foodie and loves all aspects of the culinary arts. Dr. Li is fluent in English and Chinese.

**ADAM KAVALIER:**

Adam Kavalier has over 10 years of research experience in analytical chemistry with specialties in medicinal plants and cancer pharmacology. After receiving his Ph.D. in plant chemistry from the City University of New York and The New York Botanical Garden, Adam continued his research at Cornell Medical College where he focused on cancer bioenergetics. Using analytical techniques including liquid chromatography and mass spectrometry Adam applied global metabolite profiling tools to study the accumulation of active compounds in plants and the bioenergetic intermediates in cancer metabolism. His work resulted in more than 10 peer-reviewed publications and a patent.

In 2014 Adam established a food business focused on the production of chocolates containing high concentrations of biologically active medicinal compounds.

Adam joined Holistic Remedies in 2016 to head the research and development of new cannabis products. He will focus his work on the purification and isolation of active compounds using optimized solvent extraction, chromatography and distillation. As a part of this work Adam and Holistic Remedies will develop and validate SOPs and GMPs to ensure safe and consistent manufacturing of pharmaceutical grade products.

**ALAN T. PAYNTER:**

Alan Paynter has been working with youth and families for 20 years. Currently, he is an Associate Director of Admissions in a highly selective liberal arts college here in Pennsylvania and has traveled up and down much of the eastern United States speaking to students and their families about the extraordinary opportunities available to them in a good college education. His responsibilities have also enabled him to work with thousands of students throughout his career in higher ed. Alan, however, has long had a passion for serving underrepresented and underserved students in the process of pursuing higher education. Spearheading the colleges diversity recruitment efforts have been a major part of his job success. He has been a frequent guest speaker and panelist around the country on various topics surrounding college admissions and college access work. Alan’s expertise has not gone unnoticed as he’s published several local and national articles including two featured in the New York Times Room for Debate section.

Alan’s desire to assist these students emerges from his own background. He is a grandson and raised by the late civil rights activist Ethel R. Lawrence who was responsible for what became known as the landmark NJ Supreme Court Mt. Laurel Decision which called for fair housing. She has been referred to nationally as the “Rosa Parks of affordable housing.” Her work for fairness and equality for those less fortunate was something that Alan could not escape while living with Mrs. Lawrence. He too was a product of a single parent mother who did not finish high school and eventually attempted to take her own life due to the pressures of trying to raise 3 sons with very little resources. With the intervention of his grandmother, Mr. Paynter was able to
become the only one in his family to finish high school and earning degrees from both Kutztown and Dusquesne Universities.

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

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

TERESA WINSLOW:

Teresa Winslow is a respected senior executive known for utilizing her expertise and extensive experience gained in the Healthcare IT service delivery sector as well as in the Life Sciences to significantly impact both start-ups and billion dollar corporations. As Founder of The Winslow Group, she focuses on working with Venture and Private Equity Firms within the fast-growing Healthcare IT and Life Sciences sectors. Her consulting practice is based on more than twenty years’ experience in delivering IT solutions as well as drug development services into Pharma/Biotech from a commercial and operational perspective. She enjoys an excellent reputation for actively coaching entrepreneurs and working with their organizations through issues involving organizational development, general management, business development, global account management and service delivery.

Upon graduating with a BS in Pharmacy from the University of the Sciences, the Philadelphia College of Pharmacy, Ms. Winslow began her career with Eli Lilly & Co., transitioned to Key Pharmaceuticals (acquired by Schering Plough) where she progressed through sales and marketing roles to lead the Dermatology Division.

An entrepreneur by nature, Ms. Winslow joined Dendrite, a pioneer in the development of software applications for pharmaceutical sales force management in 1990. After seven years and five promotions, she rose to the position of President, Dendrite Americas where she was responsible for 1700 employees on two continents delivering product and services to many of the top twenty Pharmas. Over her thirteen-year tenure, Ms. Winslow played a key role as an Officer of the company, in the execution of a successful IPO and growing the company in revenue while generating industry-wide acclaim. While President, Dendrite was ranked 44 among the 100 fastest growing companies in the US by Fortune Magazine.
Utilizing her pharmacy education, Ms. Winslow returned to pharmaceuticals, assuming the role of Divisional Sr. Vice President, Global Business Development in two major Contract Research Organizations, focusing on the Discovery phase through Phase IV Clinical Trials in drug development.

Ms. Winslow established her own consulting practice, The Winslow Group, working with venture/private equity firms on investments and with their portfolio companies in the Healthcare IT/Life Science space. Ms. Winslow has served in two interim COO roles for clients and has assumed the Executive Chairman role in two companies where she was a member of the Board of Directors and sold both companies successfully.

Currently, Ms. Winslow is serving in an interim role as Vice President, University Development, Marketing and Communications, at the University of the Sciences, her alma mater, where she is “giving back” to make a difference, while she continues working with clients in her consulting practice.

Ms. Winslow has been named “A Policy Maker” by Executive Women of New Jersey, was nominated three times as Business Woman of the Year, by the NJ Technology Council, selected as “Alumnae of the Quarter” at the University of the Sciences, and was honored as one of “Five Well-Placed Women” by the Eastern Technology Council.

Ms. Winslow has held positions on the Boards of Directors for five companies in the profit sector and positions on five Boards in the non-profit sector. She currently sits on the Board of two privately-held for-profit companies and on the Advisory Board of a privately-held Cyber-security company.

My business management experience, in conjunction with my expertise in healthcare IT and across the pharmaceutical business model will assist BrightStar in building a medical cannabis company focused on therapeutic outcomes, patient care and product development. My pharmacy education along with my business affiliation with the University of the Sciences, the Philadelphia College of Pharmacy, ensures that BrightStar has access to subject matter expertise in the areas of: dispensing, patient care models, basic science issues as well as medical and regulatory topics. My extensive background and capability in developing and growing companies will provide BrightStar with the expertise to accelerate the company’s growth and provide care, consultation and product, all in the best interest of the patient.

MEGAN SHANK:

Megan Shank is the founder of ANANDA Medical. She has worked in the health and wellness field for over 10 years, primarily in the pharmaceutical industry and health education. In 2014, she was hired by PharmaCannis, one of the largest medical cannabis companies in the USA. As Clinical Liaison, she became an authority on medical cannabis research and regulations by attending medical conferences with world-renowned scientists and completing accredited CME cannabis courses. Megan delivered hundreds of educational presentations to hospitals, physician groups, and hospices about the therapeutic and palliative benefits of cannabis. Prior to working in the cannabis industry, she worked with pain management physicians and addiction specialists
to treat opioid dependence. After studying the medical properties of cannabis, she realized that it could be a valuable adjunct for a variety of conditions.

Megan graduated from the University of Michigan, Ann Arbor in 2003 and grew up in Bethesda, Maryland. Megan is passionate about facilitating safe access to medical cannabis for those in need. In 2017, medical cannabis will be accessible to patients in Maryland if they obtain a certification from a qualified physician. Many medical professionals have not studied the full potential of this plant-based medicine and are unaware of the new regulations. Megan created ANANDA Medical to encourage Maryland-based medical providers to empower their patients to get safe legal access to this incredible plant-based medicine. Ananda is the Sanskrit word for joy or bliss. We help patients identify and access medical cannabis products that will improve their quality of life and enable them to experience joy – “living life to the fullest.”

RON FURIATO:

Ron has held a number of sensitive positions with the U.S. Military and management positions in the healthcare sector over the past fifteen years. He is currently District Sales Manager at Nevro Corp, the fastest growing company in the neuromodulation therapy space.

Prior to Nevro Corp, Ron was a Territory Manager with Medtronic for the Restorative Therapies Group, delivering pain management therapies to chronic pain patients. He joined Medtronic from NeuroTherm, a medical device company also specializing in chronic, intractable pain.

He came to NeuroTherm via Sanofi-Aventis Pharmaceuticals as part of the global security and compliance division. There he spearheaded the revision and implementation of their DEA compliance program.

Prior to Sanofi-Aventis, Ron served six years in the United States Air Force. During his last two years in the Air Force, Ron was a Special Agent with the Office of Special Investigations. During his time as a Special Agent, Ron directed the regional drug interdiction task force and was a member of the Joint Terrorism Task Force for the Northwest Region. During Ron’s first four years in the Air Force, he served as an Explosive Ordnance Disposal Technician where he was regularly assigned to the Secret Service Presidential Protective Division.

Ron earned his Bachelor of Business Administration from American Military University in 2006 and an Associate of Criminal Justice from the Community College of the Air Force in 2005.

ISMAEL VINCE CANALES:

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

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

MICHELLE ZENIE:

Michelle Zenie is the Executive Director of The Pediatric Cancer Foundation of the Lehigh Valley, a 501(c)3 nonprofit, dedicated to providing free programming and services to local families facing pediatric cancer. Her journey with pediatric cancer began in May 2001 when her oldest child was diagnosed with Acute Lymphoblastic Leukemia at the age of 3. Today, Michelle feels truly blessed to be able to call her son, Cole, a survivor! However her experience with pediatric cancer motivated and inspired her to dedicate her time and energy to this cause. Both Michelle and her son have been diagnosed with Post-Traumatic Stress Disorder as a result of their experiences with pediatric cancer. Michelle feels strongly that PTSD is a common long-term side effect of this disease for both patients and caregivers. Michelle is married to her wonderful husband, Karl, and has two other children, Aidan and Makenna. Prior to her work with PCFLV, Michelle taught in the Parkland School District and was employed by Rodale Press, Inc. She is a graduate of William Allen High School, Muhlenberg College (B.S. in Biology), and Manhattanville College (Master's in the Art of Teaching).

JOSHUA KAHN:

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

FAROOQ QURESHI, M.D.:

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

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

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

KATIE (DONNA) DAY:

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

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

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

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

Along with over 15 years of experience in the field of Education, Samantha has acquired work-related experiences in other industries as well. She served as the Director of Business Development for a financial company in the Lehigh Valley, performed as a top-selling Real Estate Agent, and invested time in Los Angeles working in the Entertainment Industry specializing in Public Relations, Production, and Marketing. Her most recent endeavor included an active role as an Executive Producer of Daniel Roebuck’s feature film, Getting Grace, which is a story about a 16-year-old girl who is living her life to the fullest as she embraces her terminal cancer diagnosis. Samantha also volunteers her time to programs that benefit children with disabilities, as well as offering her time and resources to the LGBTQ community.

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

SARAH EDWARDS:

Sarah is a founding partner of BrightStar Biomedics. She is Vice President of Retail Operations and is responsible for marketing and fulfillment of dispensaries relationships for the company. Born and raised in Lake Ariel, Pennsylvania (Wayne County), she is a graduate of Western Wayne High School. She received an Associates Degree in Criminal Justice from Lackawanna College. Sarah is married to Jim Edwards, and the proud mother of two children ages 18 and 14. Sarah is very active volunteering her time in the community.
After retiring from the Real Estate industry, a good portion of her time has been dedicated to staying at home to raise her children as well as caring for her nieces and nephews on a regular basis. From 2002 - 2010 Sarah volunteered regularly in the classroom at both Notre Dame Catholic School, Bethlehem, Pa and The Hillside School, Allentown, PA. Her involvement has been not only within her children's classrooms, but throughout the school on a support basis. She chaired The Hillside School Gala fundraiser in 2008, which is the primary fundraising event for the school.

Sarah has been heavily involved in her daughter's sporting ventures as well. She assisted in the running of multiple gymnastic meets from 2008 - 2011. Since 2012, she has been actively volunteering and fundraising for her daughters local and travel club softball teams.

Sarah is an active member of United Way Tocqueville Society since 2011. She is a supporter of several other local charities as well. Sarah’s hobbies and other activities include being a fitness enthusiast, exploring outdoor activities, and reading.

**DIANE MOLEWSKI:**

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

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

Diane is married to Mike Molewski and they have 3 daughters ages 29, 27 and 24. Diane’s hobbies and activities include golf, bowling, skiing, travel, knitting, crafting, and cooking.

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

MIKE MOLEWSKI:

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

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

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

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

JIM EDWARDS:

Jim serves as an experienced Board Member to BrightStar Biomedics, LLC. Jim has over 18 years of executive, operational and financial leaderships experience. Jim is a Principal and financial advisor with CAPTRUST Financial Advisors, a nationally recognized independent investment advisory firm that manages in excess of $200 billion in assets for corporate and nonprofit retirement plans and high net worth individuals. Jim is an Accredited Investment Fiduciary (AIF®) and his responsibilities include providing retirement plan advisory services to corporate fiduciaries. In his role, he works with many leading companies and higher education institutions guiding their retirement plan committees on important fiduciary governance processes, investments, and employee engagement. Prior to becoming a Principal at CAPTRUST, Jim served as a Partner and CFO for MFP Strategies a regional independent investment advisory firm. He was a member of the firm’s investment, management, and compliance committees. Jim is a shareholder in the M Financial Group where he has been a member firm principal for over 15 years.

Jim grew up in Lake Ariel, Pennsylvania and in 1998 he earned his Bachelor of Science degree in Accounting from King’s College in Wilkes-Barre, PA. Jim used his accounting degree from King’s College to launch his professional career at KPMG where he provided auditing services for corporate and pension plan financial statements. In 2015, Jim was recognized as one of the top 40 businesspersons in the Lehigh Valley, Pennsylvania.

Jim is member of the Greater Lehigh Valley United Way’s Alexis de Tocqueville Society. He is a Member of the Board of Directors, Investment Committee, Finance Committee, and Head Support and Evaluation Committee of the Hillside School, which serves the needs of children with learning disabilities. Jim served as financial advisor counsel for New York Life Retirement and Prudential Retirement. Jim is a member of the Saucon Valley Country Club. He enjoys fitness, golf, skiing, hunting and fishing. He is married to Sarah Edwards and they have two teenage children.
C. Steps to Assure Each Principal and Employee Will Meet Training Requirements

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

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

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

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

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

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

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

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

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

10. All staff are required to undergo annual refresher training, including up to 10 hours in our refresher training program. If required, employees will undergo additional training in Department-approved courses. Failure to complete refresher training within 60 days of the anniversary of hire is grounds for suspension or termination.
11. Human Resources will track each employee’s completion of refresher training requirements and will provide ample written notices of pending due dates and course options.

12. Human Resources will maintain all training and refresher training attendance logs, certificates of completion, training materials (if available), employee training tracking sheets, and other training related documents and records in electronic form for at least 4 years past the date an employee ceases to work for the company.
Letter of Intent between Bloomsburg University of Pennsylvania and BrightStar Biomedics, LLC to Provide Students Internship, Experiential Learning and Employment Opportunities.

March 3, 2017

David L. Soltz, Ph.D.
President
Bloomsburg University
400 E. 2nd Street
Bloomsburg, PA 17815

Dear President Soltz,

This document is intended to serve as a basis for a unique relationship between BrightStar Biomedics, LLC (Brightstar) and Bloomsburg University. This letter of intent outlines the key aspects of an ongoing relationship between BrightStar and Bloomsburg University for purposes of experiential learning opportunities and research collaboration. Once BrightStar is awarded a Pennsylvania operational license, BrightStar will collaborate with University staff to develop specific learning plans that meet the needs of both Bloomsburg University students as well as meet the needs of BrightStar’s commercial and research strategies. As an organization fundamentally committed to improving the lives of Pennsylvanians with serious medical conditions BrightStar is honored to be partnering with Bloomsburg University in their commitment to providing students with the most valuable educational opportunities available.

Growth Industry:

According to published report on marijuana licenses conducted by research firm Cannabiz Media, heading into 2017 the legal cannabis industry has 2,966 medical dispensaries, 3,973 retailers and 4,200 cultivators across the country. Currently 39 states have legalized cannabis in some form. An analysis by Ackrell Capital — an independent investment finance bank focused on emerging growth industries — approximates the current U.S. consumer market for marijuana (both legal and not) is $40 billion. The Ackrell Capital report also states the market will not fully develop until after the end of prohibition but they believe that the future cannabinoid-based pharmaceuticals market may ultimately exceed $50 billion annually with the potential to reach $100 billion across the medical and recreational markets.

The American cannabis industry grew by 30% from 2015 to 2016 to $6.7 billion dollars employing approximately 155,000 people across the nation according to Marijuana Business Daily. ArcView Market Research is predicting that the legal cannabis market will be a
whopping $21.8 billion in total annual sales by 2021. All projections continue to indicate that the growth rate for the cannabis industry is not slowing down and partnering with BrightStar will give students at Bloomsburg University an opportunity to gain valuable experience in a new high growth industry.

Opportunities Available to Bloomsburg University Students and Alumni

**Internship Opportunities**

<table>
<thead>
<tr>
<th>Accounting</th>
<th>Sales</th>
<th>Criminal Justice</th>
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<tbody>
<tr>
<td>Business</td>
<td>Marketing</td>
<td>Horticulture</td>
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<tr>
<td>Finance</td>
<td>Information Technology</td>
<td>MBA Students</td>
</tr>
</tbody>
</table>

**Professional Opportunities**

<table>
<thead>
<tr>
<th>Physicians</th>
<th>Procurement</th>
<th>Accountants</th>
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</thead>
<tbody>
<tr>
<td>Pharmacists</td>
<td>Finance</td>
<td>Sales and Marketing</td>
</tr>
<tr>
<td>Physician assistants</td>
<td>Sales</td>
<td>IT professionals</td>
</tr>
<tr>
<td>RN’s</td>
<td>Pharma Marketing</td>
<td>Horticulture</td>
</tr>
<tr>
<td>Nurse practitioners</td>
<td>Researchers</td>
<td>Criminal Justice</td>
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<td>Supply chain</td>
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Bloomsburg University students can participate in a wide variety of intern and externship opportunities that will be beneficial to their overall career and personal growth potential. Student internships and Academically Directed Investigator Initiated Research will allow graduate and undergraduate scholars the opportunity to examine many aspects of the cannabis industry.

**Key Terms of this Letter of Intent**

1. Brightstar will make a commitment to providing multiple internship opportunities to Bloomsburg University Students beginning in the Fall Semester of 2017.

2. Brightstar will make a commitment to conduct on-campus recruiting in identifying direct placement positions to graduates of Bloomsburg University.

3. Brightstar will make its facilities available for tours and educational learning opportunities to Bloomsburg University Faculty, Students and Administration.

4. Brightstar will support any curriculum initiatives and or professional development in the area of medical cannabis.

5. Bloomsburg University will support Brightstar’s project during application process as well as post-award in terms of letters of support and statements of community impact.
6. Bloomsburg and Brightstar will coordinate efforts and form a research collaboration that allows for both parties to benefit from the work completed.

Conclusion:

BrightStar Biomedics, LLC and its affiliates are national leaders in the medical marijuana industry and look forward to providing Bloomsburg University students with opportunities in this cutting edge and rapidly growing industry. BrightStar would also like to partner with Bloomsburg University to gain access to the exceptionally talented pool of student for academic internships and job shadowing. BrightStar values diversity and may provide economically disadvantaged student interns with paid internships or stipends based on the student need.

This letter serves to form an on-going relationship between BrightStar Biomedics, LLC and Bloomsburg University for purposes of experiential learning opportunities and research collaboration. Once BrightStar is awarded a Pennsylvania operational license, BrightStar will collaborate with University staff to develop specific learning plans that meet the needs of both Bloomsburg University students as well as meet the needs of BrightStar's commercial and research strategies. As an organization fundamentally committed to improving the lives of Pennsylvanians with serious medical conditions BrightStar Biomedics is honored to be partnering with Bloomsburg University in their commitment to providing students with the most valuable educational opportunities available.

On behalf of Bloomsburg University

Date

On behalf of BrightStar Biomedics, LLC

Date
About the Parties to the Letter of Intent

Bloomsburg University:

Bloomsburg University has a rich history of academic excellence as part of the Pennsylvania State System of Higher Education it prepares students for successful lives in a complex world. Bloomsburg has been recognized in national publications, such as Forbes, Money, GI Job Magazine and U.S. News and World Report, among others, as an institution that provides excellent educational opportunities, experiential learning and develops the dynamic and confident professional leaders of tomorrow. Bloomsburg University as the largest comprehensive university in Northeastern and North Central Pennsylvania is a vital community partner with the corporate and business sectors in the region. With over 9,000 students and more than 60,000 alumni it is imperative that any new industry partner with Bloomsburg University to collaborate on common interests for the benefit of student and industry.

BrightStar Biomedics, LLC:

BrightStar Biomedics, LLC, a Northeastern and North Central Pennsylvania medical marijuana organization will produce pharmaceutical grade medical cannabis at its medical marijuana grower/processor facility in Laurel Run, Pennsylvania. As part of BrightStar’s commercialization structure, BrightStar will develop dispensaries in the Northeastern and North Central regions of the Commonwealth. BrightStar plans to hire 250 employees or more to run its grower/processor facility and affiliated dispensaries. BrightStar will follow a commercialization structure that is representative of the pharmaceutical and biotechnology industries, where medical solutions are outcomes based and post market products are monitored on an ongoing basis to verify efficacy, quality and long term safety.

As part of this commitment to continuous improvement within the medical cannabis industry BrightStar intends to develop a strategic partnership with Bloomsburg University in the form of external learning opportunities and post graduate employment for students and graduates with the goal of developing and employing the leaders of the future in the rapidly growing medical cannabis industry.

Hosting student interns and recruiting from the talent pool being developed at Bloomsburg will be beneficial to BrightStar as well as Bloomsburg University and its students and alumni. BrightStar is a woman, veteran, and LGBTQ owned biotech, diversity is a way of life for the company we are committed to hiring highly competent, ethical, and diverse candidates. Transparency, cooperation, and collaboration are cornerstones of BrightStar’s ethos. BrightStar has partnered with a national medical marijuana leader with proprietary medicines geared toward treating and a flawless compliance record. Students will have opportunities within Northeastern and North Central Pennsylvania as well as with our national partner in Washington D.C., Maryland, Massachusetts or Arizona.
The Honorable Dr. Karen Murphy  
Secretary, Pennsylvania Department of Health  
8th Floor West, Health and Welfare Building  
625 Forster Street  
Harrisburg, PA 17120  

RE: Brightstar Biometrics, LLC – Growing Processing Operation  

Dear Honorable Dr. Karen Murphy:  

It is with great enthusiasm that I support Brightstar Biometrics LLC’s application to pursue treatment alternatives for pediatric cancer patients and those affected by pediatric cancer. As a mother who weathered the storm of pediatric cancer, I am optimistic about the potential benefits of medicinal marijuana for patient anxiety and panic attacks for the patient and the family members. Medical marijuana as an alternative treatment to alleviate nausea and appetite stimulation as it relates to chemotherapy is of particular interest to me, based on my experience.  

As a cancer mom, and in my experience working with a pediatric cancer organization, the reality of Post-Traumatic Stress Disorder is evident amongst parents dealing with pediatric cancer. Sadly, PTSD is more apparent in the bereaved families in which we support and the exploration of medicinal marijuana as an option to assist that demographic, in my opinion, is invaluable.  

Thank you for your consideration of my thoughts and experiences with the cancer community and hope you look favorable towards this application.

Respectfully yours,  

[Signature]

Lori Ferrazzoli
The Honorable Dr. Karen Murphy  
Secretary, Pennsylvania Department of Health  
8th Floor West - Health and Welfare Building  
625 Forster Street- Harrisburg, PA 17120

I am pleased to express my support of BrightStar Biomedics, LLC and the team consisting of CEO Bob Vitale, COO Josephine Vitale, CIO Samantha Edwards, CFO Tom Hall, and Counsel David Vitale in their application for establishing a Medical Marijuana Organization located in the Borough of Laurel Run, Pennsylvania. Their team has been explicit, expressing their interest in becoming permitted medical marijuana grower/processors in conjunction with the Pennsylvania Medical Marijuana Act- Act of April 17, 2016, P.L. 84, No. 16. Cl 35.

The Laurel Run Borough Council and I have had the opportunity to meet with the representatives of BrightStar Biomedics, LLC on several occasions to discuss the impact of this growing/processing center and how it would benefit our borough and its’ residents. It is with great knowledge and understanding that the individuals serving on our elected board offer our willingness to work with BrightStar Biomedics, LLC. Our compassionate elected leadership team and the applicants’ main focus is to ensure that those individuals suffering from severe pain have access to all types of medical treatment available to help with recovery or improvement of life.

As a small, rural borough with roughly 500 residents, this type of impact provides a rich opportunity for our community and the residents. In addition, as the Mayor of Laurel Run Borough, I also believe that the creation of jobs, economic benefits through taxes, and the willingness of BrightStar Biomedics, LLC to become a key leader in the community through outreach and education would immensely impact my community.

The Laurel Run Borough Council and I are committed to working with BrightStar Biomedics, LLC to ensure that all zoning and planning proposals are effectively submitted, addressed promptly and approved for a smooth transition to ensure that the thousands of Pennsylvanians and our local economy, benefit from seeking comfort and health under the Pennsylvania Medical Marijuana Act- Act of April 17, 2016, P.L. 84, No. 16. Cl 35.

The Office of the Mayor and Laurel Run Borough Council Members are completely interested in the application made by BrightStar Biomedics, LLC to become a licensed Medical Marijuana Organization in Laurel Run Borough, Luzerne County, Pennsylvania. As a rural area, secluded from the biggest and busiest cities of Pennsylvania, Laurel Run Borough is a natural choice for a medical marijuana grower/processor facility to call home. By providing a willingness for transparency, a compassion for those in need and a commitment to easy access with education and community outreach, it is with the utmost confidence that I provide support and seek your acceptance of their application and further development of this facility in Laurel Run Borough.

Sincerely,

Justin Correll  
Mayor Laurel Run Borough
March 15, 2017

Secretary Karen Murphy  
Pennsylvania Department of Health  
625 Forster St.  
Harrisburg, PA 17120

Secretary Murphy:

Bradbury-Sullivan LGBT Community Center is supportive of the new law allowing for medical marijuana in Pennsylvania, and it's come to our attention that there is an application from BrightStar Biomedics, LLC.

These entities include LGBT people in their ownership team and among their professional staff and they have already stated their interest in working with other LGBT and minority-owned businesses as vendors.

Because of the relatively small number of dispensaries that are going to be approved throughout the Commonwealth, it is important that the ones who are approved are LGBT-welcoming.

The LGBT community experiences chronic conditions, including cancer, HIV, at higher rates because of the social determinants of health that have broadly, systematically, and historically caused LGBT people to lack affirming care, and we are hopeful that your office will consider the importance of LGBT-affirming medical marijuana dispensaries, especially here in the Lehigh Valley.

Thank you for the important work

Adrian Shanker  
Executive Director
March 11, 2017

The Honorable Dr. Karen Murphy
Secretary, Pennsylvania Department of Health
8th Floor West
Health and Welfare Building
625 Forster Street
Harrisburg, PA 17120

Dear Dr. Murphy:

I am writing this letter in support of BrightStar Biomedics, LLC - Growing Processing Operation’s application to become a medical marijuana organization under Pennsylvania Act 16 of 2016. While I know many of the partners of this company personally, my purpose in writing is to provide insight as both the parent of a pediatric cancer survivor and as the Executive Director of a pediatric cancer support organization.

While most are all too familiar with the physical effects of cancer treatment, the mental and emotional side effects are often overlooked. These effects can be both short-term and long-term, as well as often having a delayed onset. Psychologists at The Children’s Hospital of Philadelphia, the leading provider of pediatric oncology treatment in the US, have been studying Post-Traumatic Stress Disorder in both pediatric cancer patients and their parents since the 1990’s and are considered the foremost experts in this field. Their studies have shown that almost 40% of parents with a child diagnosed with some form of pediatric cancer are eventually diagnosed with PTSD. In addition, approximately a quarter of all children diagnosed with cancer will eventually be diagnosed with PTSD. There are some risk factors that increase the chances of this diagnosis occurring, like financial stressors, complications during treatment, and poor long-term prognosis for the patient. Most often, treatment for PTSD includes some combination of counseling and pharmaceuticals.

As a pediatric cancer parent myself, I can share that I was diagnosed several years ago with PTSD. My son is a long-term leukemia survivor, diagnosed at age 3, undergoing almost 8 years of treatment, and now in college. In addition, my son was also diagnosed with PTSD several years ago. We have both utilized counseling and pharmaceuticals to deal with this diagnosis. As the Executive Director of a nonprofit foundation that provides free programming and support services to almost 200 local families dealing with a pediatric cancer diagnosis, I can attest to the fact that I see numbers consistent with CHOP’s research in the families with whom we deal. I have not only professional relationships but also personal relationships with many of these families, and I suspect the numbers are actually higher.

I would personally welcome the opportunity to have an additional treatment option for PTSD, like medical marijuana, for not only me and my son, but also for the many families with whom I work. BrightStar Biomedics and their team promise to be a shining star in the medical marijuana field. Their ability to positively impact the lives of countless pediatric cancer families is exciting and inspiring!

Sincerely,

Michelle Zenie
January 24, 2017

The Honorable Dr. Karen Murphy, Secretary
Pennsylvania Department of Health
Health & Welfare Building
625 Forster Street
Harrisburg, PA 17120

Dear Secretary Murphy:

As members of the Northeast Delegation we feel it is important for us to support regional projects and local companies. As ardent supporters of Act 16, we want to ensure that the legislative intent is carried out to the fullest extent. After meeting with the President and CEO of BrightStar Biomedics, we are confident that they will complianltly produce pharmaceutical grade medical marijuana products that will effectively treat serious medical conditions. BrightStar have partnered with a national leader in the medical cannabis industry who has a flawless compliance record operating in four highly regulated states.

Together BrightStar and their national partner will be able to quickly grow and produce proprietary products that have a proven track record for many of the serious medical conditions cover by Act 16 of 2016. BrightStar Biomedics plan is to quickly bring affordable high quality consistent products to the market and into the hands of Pennsylvanians suffering from serious medical conditions while deploying the most advanced security system on the market.

We were most impressed by the team of diverse professionals BrightStar has amassed to lead the company, including a CEO of a national company, executive level professional from big pharma, several highly regarded physicians, a leader of a local health system, and a former DEA agent with over 30 years fighting the war on drugs. This small family owned biotech company reflects what Pennsylvania is all about: diversity. The CEO is a USMC Veteran, and the majority ownership are women and LGBTQ. Their senior team covers all disabilities, races, religions and sexual orientations. They are diverse and committed to hiring the most diverse workforce in the industry and providing high paying family sustaining jobs.

We wholeheartedly, without reservation, offer our support of the application for license under Act 16 of 2016, to BrightStar Biomedics, LLC.

Respectfully,

Thomas R. Caltagirone
Northwest Delegation
127th Legislative District

Mark Rozzi
Northwest Delegation
126th Legislative District
March 13, 2017

The Honorable Karen Murphy, PhD
Secretary, Pennsylvania Department of Health
8th Floor West
Health and Welfare Building
625 Forster Street
Harrisburg, PA 17120

Dear Secretary Murphy,

The University of the Sciences has been engaged with BrightStar for several months during which time we’ve had the opportunity to learn of and discuss the strategy and vision they have developed to build the medical cannabis business in the Scranton-Wilkes Barre area of Pennsylvania. We are impressed with the research-based approach BrightStar is undertaking and therefore, have agreed to partner with them to study the impact medical cannabis will have on a variety of disease states.

In addition, based on our long history and expertise in pharmacy practice, our Philadelphia College of Pharmacy will be working with BrightStar to develop a dispensary patient care model focused on safety, therapeutic outcomes and a patient-centric experience for all Pennsylvanians. Through our Mayes College of Healthcare Business and Policy, we will be working with BrightStar to implement a registry, post launch, which will provide valuable outcomes-based data that will be utilized to improve patient treatment, care, and influence future outcomes.

BrightStar Biomedics has reached out to University of the Sciences as a partner based on our deep experience and leadership in pharmaceuticals, pharmacy practice, and healthcare business; we appreciate them wanting to work with us and welcome the opportunity to contribute within this new biopharmaceutical modality and treatment option in Pennsylvania. Additionally, we have performed due diligence on BrightStar’s principals and are happy to report they have met our standards. BrightStar will also be providing opportunities for our students to work on projects as the business prepares for launch, as well as employment opportunities for our Philadelphia College of Pharmacy graduates in the BrightStar dispensaries.

We are pleased to be associated with the individuals of this family owned and operated company and look forward to the contributions we as a University can make within this new therapeutic category.

Thank you for your consideration.

Sincerely,

Paul Katz, MD
President
The Honorable Dr. Karen Murphy  
Secretary, Pennsylvania Department of Health  
8th Floor West  
Health and Welfare Building  
625 Forster Street  
Harrisburg, PA 17120  

Dear Honorable Dr. Karen Murphy,

As President of King’s College, I am pleased to endorse BrightStar Biomedics, LLC’s application to be a medical marijuana organization under Pennsylvania Act 16 of 2016. I know the founding partners of this company personally, one of which is a long standing board member of the college, and I can attest to their high character, morals, faith, and commitment to their communities.

BrightStar Biometrics, LLC is a family owned and operated, locally based biotechnology company with a majority of its board and executives being King’s College alumni. These individuals are leaders in their respective industries and epitomize King’s values of professionalism and service to, and for, the common good.

As community leaders they generosity demonstrate ideals emphasized while students at King’s College; commitment of time, talent, and resources in service of human flourishing within community.

Just as King’s has been dedicated to the Holy Cross ideal of transforming minds and hearts with zeal in communities of hope, BrightStar exemplifies this hope. The King’s community is very proud of them and their desire to help people suffering from serious medical conditions.

I am pleased that the business strategy for this group includes academic partnership opportunities for King’s College in the form of externships, research data analysis, and executive workforce training needed to develop leaders of the future and we look forward to partnering with them.

Thank you for your consideration.

Sincerely,

Rev. John J. Ryan, C.S.C., Ph.D.  
President
March 1, 2017

The Honorable Dr. Karen Murphy
Secretary, Pennsylvania Department of Health
8th Floor West
Health and Welfare Building
625 Forster Street
Harrisburg, PA 17120

Dear Honorable Dr. Karen Murphy,

I write this letter to endorse BrightStar Biomedics, LLC’s application to be a medical marijuana organization under Pennsylvania Act 16 of 2016. I know many of the founding partners of this company personally, one of which is a long standing board member of King’s College. I can attest to these individuals’ high character, morals, faith, and commitment to their communities.

BrightStar Biometrics, LLC is a family-owned and operated, locally-based biotechnology company with a majority of its board and executives being King’s College alumni. These individuals are leaders in their respective industries, they epitomize King’s values, and they generously give back to their communities. The generosity they exhibit is in keeping with the values they learned while students at King’s College, and the commitment of their time, talent, and resources to serve and improve their – and our – communities is inspiring.

Just as King’s is dedicated to the Holy Cross ideal of transforming minds and hearts with zeal in communities of hope, BrightStar exemplifies this hope. We are proud of the King’s alumni engaged in this effort, specifically their desire to help people suffering from serious medical conditions.

I am pleased that the business strategy for this group includes academic partnership opportunities for King’s College in the form of externships, research data analysis, and executive workforce training needed to develop leaders of the future. We look forward to partnering with them in these potentially transformative endeavors.

Thank you for your consideration.

Sincerely yours,

[Signature]

Frederick A. Pettit, Esquire ’96
Vice President for Institutional Advancement

FAP:jmg
<table>
<thead>
<tr>
<th>Activity</th>
<th>Estimated Date</th>
</tr>
</thead>
<tbody>
<tr>
<td>Department awards permit to company</td>
<td>9/1/17</td>
</tr>
<tr>
<td>Finalize all plans and designs; select contractor</td>
<td>9/20/2017</td>
</tr>
<tr>
<td>Submit building permit application to municipality</td>
<td>9/22/2017</td>
</tr>
<tr>
<td>Begin Demolition activities</td>
<td>10/1/2017</td>
</tr>
<tr>
<td>Begin construction</td>
<td>11/15/2017</td>
</tr>
<tr>
<td>Begin management interviewing process</td>
<td>12/1/2017</td>
</tr>
<tr>
<td>Begin management training process</td>
<td>12/15/2017</td>
</tr>
<tr>
<td>Begin staff interviewing process</td>
<td>1/1/2018</td>
</tr>
<tr>
<td>Begin staff training process</td>
<td>1/15/2018</td>
</tr>
<tr>
<td>Order and install all cultivation and processing equipment</td>
<td>1/16/2018</td>
</tr>
<tr>
<td>Obtain C/O</td>
<td>2/20/2018</td>
</tr>
<tr>
<td>Pass Department of Health inspections</td>
<td>2/25/2018</td>
</tr>
<tr>
<td>Begin operations</td>
<td>3/1/2018</td>
</tr>
</tbody>
</table>
BRIGHTSTAR BIOMEDICS

First Name: Robert
Middle Name:
Last Name: Vitale
Suffix:
Occupation: President & CEO, Horizon Facility Services
Title in Applicant’s Business: CEO, Financial Backer
Also Known As:
Date of Birth (mm/dd/yyyy): [DOH Redacted]

Ownership: 12.34%

First Name: Ronald
Middle Name: Anthony
Last Name: Furiato, Jr.
Suffix:
Occupation: Medical Device Sales
Title in Applicant’s Business: Security manager
Also Known As:
Date of Birth (mm/dd/yyyy): [DOH Redacted]

First Name: Martin
Middle Name: Karl
Last Name: Till
Suffix:
Occupation: Regional President at J.G. Petrucci Company, Inc.
Title in Applicant’s Business: General Manager
Also Known As:
Date of Birth (mm/dd/yyyy): [DOH Redacted]
First Name: Megan
Middle Name: P.
Last Name: Shank
Suffix:
Occupation: Director of Sales & Medical Cannabis Education
Title in Applicant’s Business: VP Sales
Also Known As:
Date of Birth (mm/dd/yyyy): DOH Redacted
Address: DOH Redacted

First Name: Teresa
Middle Name: F.
Last Name: Winslow
Suffix:
Occupation: Management Consultant/University Executive
Title in Applicant’s Business: Head Pharmaceutical Standards, QC Manager
Also Known As:
Date of Birth (mm/dd/yyyy): DOH Redacted

First Name: Josh
Middle Name:
Last Name: Genderson
Suffix:
Occupation: President and CEO of Schneider's on Capitol Hill, Holistic Industries Inc, Holistic Remedies LLC, Organic Wellness LLC and Holistic Industries LLC
Title in Applicant’s Business: COO
Also Known As:
Date of Birth (mm/dd/yyyy): DOH Redacted
Fax: N/A
First Name: Joseph
Middle Name: P.
Last Name: Salvemini
Suffix:
Occupation: Security Consultant
Title in Applicant’s Business: Head Diversion Control
Also Known As:
Date of Birth (mm/dd/yyyy): DOH Redacted

First Name: Michelle
Middle Name:
Last Name: Zenie
Suffix:
Occupation: Non-Profit Executive Director
Title in Applicant’s Business: Adv Bd
Also Known As:
Date of Birth (mm/dd/yyyy): DOH Redacted

First Name: Samantha
Middle Name: A.
Last Name: Edwards
Suffix:
Occupation: Media Specialist, Parkland School District
Title in Applicant’s Business: Owner only
Also Known As:
Date of Birth (mm/dd/yyyy): DOH Redacted
Ownership: 12.33%

First Name: Vince
Middle Name:
Last Name: Canales
Suffix:
Occupation: President of Fraternal Order of Police
Title in Applicant’s Business: VP Security
Also Known As:
Date of Birth (mm/dd/yyyy): [Redacted]
Address: [Redacted]

Ownership: 12.33%

First Name: Josephine
Middle Name:
Last Name: Vitale
Suffix:
Occupation: Medical Device Sales Manager
Title in Applicant’s Business: President
Also Known As: Josie
Date of Birth (mm/dd/yyyy): [Redacted]

Ownership: 12.33%

First Name: Sarah
Middle Name: Rae
Last Name: Edwards
Suffix:
Occupation: Housewife
Title in Applicant’s Business: Owner only
Also Known As:
Date of Birth (mm/dd/yyyy): [Redacted]
Email: **DOH Redacted**
Ownership: 12.33%

First Name: Diane
Middle Name: 
Last Name: Molewski
Suffix: 
Occupation: Housewife
Title in Applicant’s Business: Principal, Financial Backer
Also Known As: 
Date of Birth (mm/dd/yyyy): **DOH Redacted**
Address: **DOH REDACTED**

Ownership: 12.34%

First Name: Dona
Middle Name: Elizabeth
Last Name: Hall
Suffix: 
Occupation: Occupational Therapist
Title in Applicant’s Business: Owner only
Also Known As: 
Date of Birth (mm/dd/yyyy): **DOH Redacted**

Ownership: 12.33%

First Name: Michael
Middle Name: D.
Last Name: Molewski
Suffix: 
Occupation: Principal Financial Advisor
Title in Applicant’s Business: Financial Backer
Also Known As: 
Date of Birth (mm/dd/yyyy): **DOH Redacted**
Address: **DOH REDACTED**
First Name: Jimmy
Middle Name:
Last Name: Edwards
Suffix:
Occupation: Financial Advisor
Title in Applicant’s Business: Financial Backer
Also Known As:
Date of Birth (mm/dd/yyyy): DOH Redacted

First Name: Giro
Middle Name: Thomas
Last Name: Hall
Suffix:
Occupation: COO
Title in Applicant’s Business: CFO
Also Known As: Tom
Date of Birth (mm/dd/yyyy): DOH Redacted

First Name: Alan
Middle Name: T
Last Name: Paynter
Suffix: M.S.
Occupation: Associate Director of Admissions, Dickinson College
Title in Applicant’s Business: Diversity and Inclusion Officer
Also Known As:
Date of Birth (mm/dd/yyyy): DOH Redacted
First Name: Joshua
Middle Name: 
Last Name: Kain
Suffix: 
Occupation: COO/Manager Takoma Wellness Center
Title in Applicant’s Business: Advisory Board
Also Known As: Josh
Date of Birth (mm/dd/yyyy): [DOH Redacted]

First Name: Farooq
Middle Name: A.
Last Name: Qureshi
Suffix: MD
Occupation: Physician
Title in Applicant’s Business: Clinical Program Director
Also Known As: 
Date of Birth (mm/dd/yyyy): [DOH Redacted]

First Name: Mark
Middle Name: 
Last Name: Li
Suffix: MD, PhD
Occupation: Chief, Division of Neurosurgery
Title in Applicant’s Business: Chief Medical Officer
Also Known As: 
Date of Birth (mm/dd/yyyy): [DOH Redacted]
First Name: Donna
Middle Name: C
Last Name: Day
Suffix: Rev.
Occupation: Reverend
Title in Applicant’s Business: Advisory Board
Also Known As: Katie
Date of Birth (mm/dd/yyyy): [Redacted]

First Name: Adam
Middle Name:
Last Name: Kavalier
Suffix:
Occupation: Chief Scientific Officer Holistic Remedies and Organic Wellness
Title in Applicant’s Business: Chief Scientific Officer
Also Known As:
Date of Birth (mm/dd/yyyy): [Redacted]

First Name: Michael
Middle Name: Patrick
Last Name: Edmiston
Suffix: Esq.
Occupation: Retired Atty.
Title in Applicant’s Business: VP Legal and Compliance
Also Known As: Mike
Date of Birth (mm/dd/yyyy): [Redacted]
Attachment I: Affidavit of Capital Sufficiency

Instructions:
- The applicant must submit an affidavit stating that the applicant meets the capital requirements set forth in §1141.30 (relating to capital requirements)
- Note that there are two different versions below:
  - Attachment I-1 is the affidavit for a grower/process applicant
  - Attachment I-2 is the affidavit for a dispensary applicant
- Execute the appropriate affidavit and save as a PDF file called “Attachment I,” using the appropriate file name format. A cover sheet is not needed.
ATTACHMENT I-1: AFFIDAVIT OF CAPITAL SUFFICIENCY FOR A GROWER/PROCESSOR PERMIT APPLICANT

COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF HEALTH

AFFIDAVIT OF CAPITAL SUFFICIENCY

State of Pennsylvania
County of Northampton

I/WE ____________________________

Robert Vitale

DOH Redacted

For the following applicant:

BrightStar BioMedics LLC
NAME OF BUSINESS

425 Spruce Street Ste 200
ADDRESS

Scranton PA 18501 Lackawanna
CITY STATE ZIP CODE COUNTY

hereby certify that the Applicant named has at least $2,000,000 in capital, $500,000 of which is on deposit with one or more financial institutions, as follows (capital may include cash or securities, real estate, or other assets):
<table>
<thead>
<tr>
<th>Type of Capital</th>
<th>Source of Capital</th>
<th>Total Value of Capital</th>
<th>Value not encumbered by debt or other obligations</th>
<th>If on deposit, name and address of financial institution</th>
<th>If on deposit, account number</th>
</tr>
</thead>
</table>
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).

\[Signature\ of\ Affiant\ and\ Title\]

\[Date\]

Sworn to and subscribed before me this \[15\] day of \[March\, 2017\].

\[Notary\ Public\]

MY COMMISSION EXPIRES: \[April 2, 2019\]

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