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
☐ Southcentral
☐ Southeast

County: Lebanon
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**

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

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

<table>
<thead>
<tr>
<th>Business Address: 1594 Cumberland Street #300</th>
</tr>
</thead>
<tbody>
<tr>
<td>City: Lebanon</td>
</tr>
<tr>
<td>State: PA</td>
</tr>
<tr>
<td>Zip Code: 17042</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Phone:</th>
<th>Fax: N/A</th>
</tr>
</thead>
<tbody>
<tr>
<td>Email: <a href="mailto:lebanonbiopharma@gmail.com">lebanonbiopharma@gmail.com</a></td>
<td></td>
</tr>
</tbody>
</table>

☒ Primary Contact or ☐ Registered Agent for this Application

| Name: Dr. Kibibi Gaughan |

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

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

<table>
<thead>
<tr>
<th>Facility Name: Lebanon BioPharma LLC</th>
</tr>
</thead>
<tbody>
<tr>
<td>Facility Address: 1 State Drive</td>
</tr>
<tr>
<td>City: Lebanon</td>
</tr>
<tr>
<td>State: PA</td>
</tr>
<tr>
<td>Zip Code: 17042</td>
</tr>
<tr>
<td>County: Lebanon</td>
</tr>
<tr>
<td>Municipality: South Lebanon Township</td>
</tr>
</tbody>
</table>

☐ 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
Pennsylvania Department of Health
Medical Marijuana Grower/Processor Permit Application

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

<table>
<thead>
<tr>
<th>Yes</th>
<th>No</th>
</tr>
</thead>
<tbody>
<tr>
<td>☒</td>
<td></td>
</tr>
</tbody>
</table>

Part B – Diversity Plan

(Scoring Method: 100 Points)

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

Section 3 – Diversity Plan

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

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

DIVERSITY PLAN

In narrative form below, describe a plan that establishes a goal of diversity in ownership, management, employment and contracting to ensure that diverse participants and diverse groups are 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.

Lebanon BioPharma seeks to implement a highly regarded and well thought out Diversity Plan. We take our approach to diversity seriously and have accordingly engaged the professional services of Brubaker Connaughton Goss & Lucarelli LLC, employment and labor counsel, to prepare the comprehensive Diversity Plan below.

As a women and veteran-owned business, diversity and inclusion are critically important to Lebanon Biopharma. The company views diversity and inclusion as core business strategies which contribute to its overall success. When a company’s workforce reflects the community it serves, the company is better able to understand and meets the needs of its customers and the community at-large.

As part of Lebanon BioPharma’s commitment to diversity, the company engaged the services of employment and labor counsel to prepare a comprehensive Diversity Plan to establish a diversity strategy, and guide the company’s efforts in implementing its diversity strategy in the initial, start-up phase and beyond. A copy of the complete Diversity Plan is available upon request.

Lebanon BioPharma’s Diversity Plan outlines the company’s affirmative action initiatives, diversity goals, outreach plan, contracting strategy and professional development objectives. The Diversity Plan is based upon the company’s Diversity and Inclusion Mission Statement, which provides:

We believe that embracing diversity enhances our company culture and contributes to the overall success of our business. The company’s diversity and inclusion mission is to create a welcoming work environment where
individuals of all backgrounds and experiences can enjoy personal and professional success, and have equal access to opportunities.

To support and advance its diversity and inclusion mission, Lebanon BioPharma has established four core areas where the company will focus its diversity strategy: (1) Company Leadership; (2) Recruitment and Hiring; (3) Professional Development and Retention; and (4) Partnerships with Vendors.

Diversity Status of Principals, Operators, Financial Backers and Employees of the Medical Marijuana Organization.

A strategic initiative must be supported, fostered and encouraged at the highest levels of a company if it is to succeed. Lebanon BioPharma is proud to have a diversity strategy that starts at the top and will be reflected at all levels of the organization. The company is majority women-owned and, if a grower/processor license is granted, the company intends to seek certification as a Women’s Business Enterprise.

By reflecting diversity at the highest levels of the company, Lebanon Biopharma is actively modeling its Diversity and Inclusion Mission on a day-to-day basis, and setting the tone for its employees, vendors and other points of contact.


Lebanon BioPharma’s Diversity Plan includes an official Affirmative Action Plan, pursuant to which the company has established hiring and placement goals based on labor force statistics for Lebanon County.

Given that Lebanon BioPharma is still in its early start-up phases, the company’s hiring and placement goals are based on the company’s workforce as a whole, without regard to specific job categories. As Lebanon BioPharma becomes operational and its workforce grows in size,
the company may, as appropriate, shift its utilization analysis and placement goals to a job
group analysis.

Based upon labor force statistics provided by Pennsylvania Center for Workforce Information
and Analysis, 2017-2018 placement goals across all job positions are as follows:

- Female: 47.0%
- Minority: 11.8%
- Veteran: 8.1%

The company’s affirmative action plan contains a number of action oriented objectives which
Lebanon BioPharma plans to adopt and implement to ensure that it reaches its placement
goals. Those objectives are set forth in detail below, as part of the company’s specific
diversity goals.

**Internal Diversity Goals.**

Through its formal Diversity Plan, Lebanon BioPharma has established three diversity goals
which align with its core areas of focus.

**Diversity Goal #1: Recruitment and Hiring**

*To strive for, achieve and maintain employment participation for protected group
members throughout all job categories in proportion to the local labor force.*

This goal is specifically tied to the benchmarks established in the company’s
Affirmative Action Plan, which will guide the company’s recruitment and hiring
strategy. The company has identified the following recruitment and hiring strategies
which it will implement to achieve those benchmarks:

- Job openings will be distributed to community-based recruitment sources,
  including workforce development agencies and community organizations.

  Lebanon BioPharma has already identified several diverse vendors with which
  it may partner to ensure that its recruitment strategy encompasses the broadest
  possible applicant pool. Partnerships with these organizations will allow
  Lebanon BioPharma to focus its recruitment efforts on veterans, individuals
  with disabilities, and other populations experiencing disenfranchisement with
  respect to the local labor market.

- Lebanon BioPharma will actively recruit diverse candidates from local
  colleges, universities, community colleges, trade schools and other educational
  institutes, by distributing job postings and attending job and career fairs.

- The company will utilize employment agencies and recruiters with experience
  in recruiting diverse candidates. This recruitment strategy also advances the
company’s goal of enhancing diverse participation through partner relationships with vendors, by allowing Lebanon BioPharma to explore partnership opportunities with employment agencies that hold a Small Diverse Business certification.

- Lebanon BioPharma will post and maintain employment information on its website explaining the company’s Diversity and Inclusion Mission, and listing available job openings.

- Job descriptions will be carefully developed and implemented to ensure that they do not include restrictive and unnecessary minimum requirements that might restrict the company’s ability to employ diverse and disenfranchised candidates.

- The company will actively seek out diverse media sources in the local and extended community that may include print, radio, television and internet advertising for open job positions.

- The Chief Diversity Officer will assist in recruitment and hiring efforts to ensure that the company’s Diversity and Inclusion Mission is being effectively carried out, and that recruitment efforts are reaching a diverse pool of potential applicants.

**Diversity Goal #2: Professional Development and Retention**

To maintain employment participation for protected group members by retaining diverse employees and ensuring equal opportunity for advancement.

Lebanon BioPharma recognizes that bringing on new employees is only one piece of its diversity and inclusion strategy. Once employees become part of the Lebanon BioPharma team, the company is committed to both their professional development and personal growth. Emphasis will be placed on skills development, promoting from within, and equal opportunity for advancement.

Lebanon BioPharma will implement the following strategies to enhance the professional development of its employees:

- The company’s equal employment opportunity, anti-discrimination and anti-harassment, and ADA policies will be included in the employee handbook and disseminated to all employees at the time of hire, and the Diversity and Inclusion Mission Statement will be posted throughout company facilities.

- Lebanon BioPharma will provide diversity training to all employees to reinforce its Diversity and Inclusion Mission, foster a welcoming work environment for all employees, and ensure that managers and employees understand their rights and obligations under the company’s equal employment opportunity, anti-discrimination and anti-harassment, and ADA policies.
The company will provide manager training to management level employees to assist managers in identifying workplace conduct and issues that violate the company’s anti-discrimination and anti-harassment policy, responding to reports of discrimination and harassment, and helping to create a workplace free of discrimination and harassment.

Lebanon BioPharma will develop an onboarding process to orient new employees, which will include special focus on the company’s Diversity and Inclusion Mission and objectives.

The company will develop a mentoring program to partner new employees with existing employees to assist new employees in becoming acclimated to the company, and provide a point of contact for new employees to ask questions in an open forum. The mentoring program will also include the opportunity for interaction with company leadership.

The company will develop and implement mobility programs aimed at helping employees to grow and advance within the company, and ensuring that all employees have an equal opportunity for advancement. Mobility programs may include educational opportunities for line level employees who aspire to management positions, skills training for management-level employees and a mentoring program.

Diversity Goal #3: Partnerships with Vendors

To ensure that qualified Small Diverse Businesses have equal opportunity to bid and contract for the provision and goods and services to Lebanon BioPharma.

The third prong of Lebanon BioPharma’s diversity strategy is to partner with Small Diverse Businesses (SBDs) for its contracting needs. The company will actively seek out partnerships with diverse vendors, suppliers, contractors and service providers to enhance the participation of these groups in the success of its business, and to provide opportunities for diverse businesses to be successful.

Vendor Guidelines

In an effort to meet this goal, Lebanon BioPharma will abide by the following guidelines with respect to its third-party vendor relationships:

- The company will utilize the Pennsylvania Department of General Services Bureau of Diversity, Inclusion & Small Business Opportunities searchable database to locate Small Diverse Businesses that offer goods and services vital to the company’s business operations.

- When the need for a third-party vendor arises, the company will actively solicit Small Diverse Businesses for business and contracting opportunities.
The company will develop a database of Small Diverse Businesses to serve its contracting needs.

The company will include information on its website describing its procurement needs, processes and general contract information, and inviting Small Diverse Businesses to contact the company about contracting opportunities.

The company will assist diverse vendors and suppliers by providing information and feedback concerning the company’s contracting needs so that they can compete effectively on price, service, and quality.

The Chief Diversity Officer will work with Department Managers to track and quantify dollar volume and performance of suppliers and vendors to monitor compliance with this Diversity Plan.

The company will require that all vendors who do business with the company have equal employment opportunities in place, and will request this information as part of its competitive bidding process.

The company will develop a competitive bidding process that maximizes participation by diverse vendors.

The company will develop a process to integrate a supplier diversity program into its sourcing process.

A Plan for Diversity-Oriented Outreach Events.

Lebanon BioPharma’s diversity-outreach strategy is encompassed within its formal Diversity Plan. The company has identified a number of recruitment strategies aimed at generating a broad and diverse applicant pool. These outreach efforts will include partnerships with community organizations which will allow Lebanon BioPharma to focus its recruitment efforts on veterans, individuals with disabilities, and other populations experiencing disenfranchisement with respect to the labor market. In particular, the company intends to form relationships with the following agencies and organizations, which focus on job placement for disenfranchised populations:

- Pennsylvania CareerLink;
- Pennsylvania Office of Vocational Rehabilitation Services;
- Disability Rights Pennsylvania;
- Lebanon County Community Action Partnership;
- Developmental and Disability Services of Lebanon Valley;
- United Way of Lebanon County; and
- AHEDD.
The company’s Diversity Plan also requires the creation of an internal Diversity Focus Group. Among the Focus Group’s core responsibilities are:

- Developing internal programs and events which foster the company’s Diversity Plan.
- Developing external programs and events which positively impact the community; developing, supporting and advertising employee volunteer opportunities and events.

Contracts with Diverse Groups and the Expected Percentage and Dollar Amount of Revenues that Will be Paid to Diverse Groups.

As set forth in the company’s Diversity Plan, Lebanon BioPharma has outlined various vendor guidelines that it intends to implement and follow in order to increase participation by diverse vendors.

If a grower processor permit is granted, one of Lebanon BioPharma’s first major tasks will be the design and construction of a cultivation facility. This construction project presents significant opportunities for the company to partner with Small Diverse Businesses that provide design services, construction services, construction management services, and construction goods. The company has established a preliminary budget of $6 million to construct its cultivation facility. Of the total construction budget, the company’s goal is to allocate a minimum of 50% of its budget to Small Diverse Business contractors.

Lebanon BioPharma has also identified several areas where the opportunity exists for the company to partner with SDBs. These include:

**Procurement of Goods**
- Procurement of agricultural machinery.
- Procurement of soil, soil sampling apparatus and soil testing resources.
- Procurement of cultivation supplies – pots, planters, shovels, etc.
- Procurement of office supplies and computer equipment.
- Procurement of cleaning and janitorial supplies.
- Procurement of office furniture.

**Procurement of Services**
- Design, construction and procurement of irrigation systems.
- Design, construction and procurement of greenhouses.
- Design, construction and procurement of greenhouse ventilation.
- Information Technology and network services and support.
- Staffing and recruitment services.
- Snow removal services.
- Payroll processing.
- Janitorial services.
The company has pledged to allocate a minimum of 50% of its procurement budget to Small Diverse Business contractors, and has already begun compiling a database of SDBs, which is included in its Diversity Plan.

Any Materials from the Medical Marijuana Organization’s Mentoring, Training or Professional Development Programs for Diverse Groups.

As reflected in Lebanon BioPharma’s Diversity Plan, the company has committed to: (1) providing diversity training to all employees; (2) provide manager training to management-level employees to reinforce the company’s Diversity and Inclusion Mission; (3) developing an onboarding process to orient new employees to the company; (4) developing a mentoring program to partner new employees with existing employees and provide interaction with company leadership; and (5) developing mobility programs aimed at helping employees grow and advance within the company, and ensuring equal opportunity for advancement.

In light of the fact that the company is still in the initial start-up phase, training materials have not yet been developed. At the company’s request, employment and labor counsel provided recommendations for manager and employee training, and are prepared to facilitate training sessions once Lebanon BioPharma is operational.

Other Information Demonstrating a Commitment to Diversity.

To support and advance its Diversity and Inclusion Mission, Lebanon BioPharma has adopted the following employment policies, which are summarized as follows:

Equal Employment Opportunity Policy
Lebanon BioPharma’s policy is to select, place, train and promote the best qualified individuals. The company is committed to complying with local, state and federal laws, and recognizes the following protected classes of individuals: race, color, ethnicity, ancestry, national origin, gender, sex, age, disability, religion, citizenship, sexual orientation, gender identity, veteran status, marital status, labor union membership, genetic disposition and other non-job-related criteria.

Anti-discrimination and Harassment Policy
Illegal harassment of employees or of applicants by other employees is strictly prohibited. Harassment includes, without limitation, verbal harassment (epithets, derogatory statements, slurs), physical harassment (assault, physical interference with normal work or involvement), visual harassment (posters, cartoons, drawings), and innuendo.

In the event that an employee has concerns about workplace conduct that may constitute harassment or discrimination, the policy establishes a reporting procedure...
for employees to bring their concerns to the attention of management. The reporting procedure identifies two (2) points of contact to whom a report may be made, the Chief Diversity Officer and the General Manager, so that employees who may be uncomfortable reporting to one individual have a second option.

The policy provides that all reports will be promptly investigated, and that appropriate disciplinary action may be taken if it is determined that harassment or discrimination have occurred.

**Americans with Disabilities Act Policy**

The company’s ADA policy reflects its commitment to ensure that qualified individuals with disabilities enjoy equal access to the benefits of employment. The policy prohibits discrimination on the basis of disability, provides that medical information will be kept confidential and stored in accordance with the ADA, and provides for reasonable accommodation. The policy also outlines the process for an employee to request a reasonable accommodation on the basis of disability.

The company’s Diversity Plan also creates an internal infrastructure to implement, monitor and revise its diversity strategy. The Plan creates the executive-level position of Chief Diversity Officer, who has ultimate responsibility and accountability for the Diversity Plan. The Chief Diversity Officer is responsible for: implementing the Diversity Plan, evaluating the effectiveness of the Plan on an annual basis; reviewing and revising the Plan and the company’s employment policies as needed to attract, retain and promote a diverse and inclusive workforce; introducing and overseeing diversity initiatives to promote the company’s Diversity and Inclusion Mission; developing training and professional development programs to educate managers and employees on Lebanon BioPharma’s Diversity Plan and employment policies; and reporting to and advising the executive team on diversity issues.

The Chief Diversity Officer will be supported by a Diversity Focus Group, whose membership will consist of employees at all levels of the organization. The Plan also outlines the specific duties and responsibilities of the company’s Executive Team, Department Managers and frontline managers and supervisors, with respect to implementation and enforcement of the Plan.

**Workforce Utilization Report**

Our workforce utilization report will include and track the following information by job position:

- Total number of Employees by Gender;
- Total number of White employees by Gender;
- Total number of Black employees by Gender;
- Total number of Hispanic/Latino employees by Gender;
- Total number of Other Race employees by Gender;
- Total number of Veteran Employees By Gender;
- Total number of Service-disabled Veteran Employees By Gender;
- Total number of Female Employees;
- Female Employees as a Percentage of Total Employees;
- Total number of Minority Employees;
- Minority Employees as a Percentage of Total Employees;
- Total number of Veteran Employees;
- Veteran Employees as a Percentage of Total Employees;
- Total number of Service-disabled Veteran Employees; and
- Service-disabled Veteran Employees as a Percentage of Total Employees.

**Ability to Record and Report on the Components of the Diversity Plan.**

Lebanon BioPharma recognizes that a strategic objective is only meaningful if it produces measurable results. The company’s Diversity Plan provides that the Chief Diversity Officer will evaluate the Plan’s effectiveness on an annual basis and includes a framework for measurement and accountability. The Plan’s effectiveness will be measured in five (5) key areas:

**Representation**
Comparing representation of diverse groups in the company’s workforce with labor market statistics for the local community. A workforce utilization report will be prepared annually to assess the representation of women, minorities and veterans in Lebanon BioPharma’s workforce.

**Recruitment**
Comparing representation of diverse groups in the company’s applicant pool with labor market statistics for the local community.

**Staffing/Placement**
Comparing representation of diverse groups hired or placed with labor market statistics for the local community.

**Retention**
Are diverse groups being retained and advanced at expected rates relative to labor market statistics for the local community.

**Contracting**
Comparing the number and value of contracts awarded to SDBs and with the total number and value of all contracts awarded for goods and services.
The Diversity Plan also establishes auditing and reporting procedures to ensure that the Plan is evaluated on a yearly basis and that the Chief Diversity Officer has the necessary information to measure the effectiveness of the Plan, highlight areas of concern, and make recommendations and revisions to the Plan to address areas of concern.

### 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>
</tr>
</thead>
<tbody>
<tr>
<td><strong>First Name:</strong></td>
</tr>
<tr>
<td>Kibibi</td>
</tr>
<tr>
<td>Occupation: Physician</td>
</tr>
<tr>
<td>Also known as:</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Name and Residential Address</th>
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</thead>
<tbody>
<tr>
<td><strong>First Name:</strong></td>
</tr>
<tr>
<td>Laura</td>
</tr>
<tr>
<td>Occupation: Optometrist</td>
</tr>
<tr>
<td>Also known as: Laura Seiling</td>
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</table>

<table>
<thead>
<tr>
<th>Name and Residential Address</th>
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<tbody>
<tr>
<td><strong>First Name:</strong></td>
</tr>
<tr>
<td>Lois</td>
</tr>
<tr>
<td>Occupation: RN</td>
</tr>
<tr>
<td>Also known as:</td>
</tr>
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</table>

<table>
<thead>
<tr>
<th>Name and Residential Address</th>
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</thead>
<tbody>
<tr>
<td><strong>First Name:</strong></td>
</tr>
<tr>
<td>Julie</td>
</tr>
<tr>
<td>Occupation: Business Owner</td>
</tr>
<tr>
<td>Also known as:</td>
</tr>
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</table>
Pennsylvania Department of Health
Medical Marijuana Grower/Processor Permit Application

Name and Residential Address
<table>
<thead>
<tr>
<th>First Name: Marla</th>
<th>Middle Name: Palmer</th>
<th>Last Name: Dorf</th>
<th>Suffix:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Occupation: Teacher</td>
<td>Title in the applicant’s business: Medical Marijuana Research</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Also known as:</td>
<td>DOH REDACTED</td>
<td></td>
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</table>

Name and Residential Address
<table>
<thead>
<tr>
<th>First Name: Glen</th>
<th>Middle Name: Joseph</th>
<th>Last Name: Mesaros</th>
<th>Suffix:</th>
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</thead>
<tbody>
<tr>
<td>Occupation: Physician</td>
<td>Title in the applicant’s business: CEO</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Also known as:</td>
<td>DOH REDACTED</td>
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</table>

Name and Residential Address
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<thead>
<tr>
<th>First Name: George</th>
<th>Middle Name:</th>
<th>Last Name: Archos</th>
<th>Suffix:</th>
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<tbody>
<tr>
<td>Occupation: Cultivation and Dispensary Owner</td>
<td>Title in the applicant’s business: COO</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Also known as:</td>
<td>DOH REDACTED</td>
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<td></td>
</tr>
</tbody>
</table>

If more space is required, please submit additional information on other individuals in a separate document titled “Principals, Financial Backers and Operators (Cont’d)” in accordance with the attachment file name format requirements and include 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
<table>
<thead>
<tr>
<th>First Name: N/A</th>
<th>Middle Name:</th>
<th>Last Name:</th>
<th>Suffix:</th>
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<tbody>
<tr>
<td>Occupation:</td>
<td>Title in the applicant’s business:</td>
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<td></td>
</tr>
<tr>
<td>Also known as:</td>
<td>Date of birth: MM/DD/YYYY</td>
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</tr>
<tr>
<td>Address Line 1:</td>
<td>Address Line 2:</td>
<td></td>
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</tr>
<tr>
<td>Address Line 3:</td>
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</tr>
<tr>
<td>Phone:</td>
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Name and Residential Address
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<tbody>
<tr>
<td>Occupation:</td>
<td>Title in the applicant’s business:</td>
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<tr>
<td>Also known as:</td>
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<tr>
<td>Address Line 1:</td>
<td>Address Line 2:</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Address Line 3:</td>
<td>City:</td>
<td>State:</td>
<td>Zip Code:</td>
</tr>
<tr>
<td>Phone:</td>
<td>Fax:</td>
<td>Email:</td>
<td></td>
</tr>
</tbody>
</table>
Section 5 – Moral Affirmation

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

Yes ☐ No ☐

Section 6 – Compliance with Applicable Laws and Regulations

By checking “Yes,” you affirm that you, as well as the principals, financial backers, operators and employees listed in this permit application are able to continuously comply with all applicable Commonwealth laws and regulations relating to the operation of a medical marijuana grower/processor facility.

Yes ☐ No ☐

Section 7 – Civil and Administrative Action

For the statements below:

- By checking “Yes,” you affirm the statement
- If you check “No,” you must state your reasoning in “Schedule A” below
Pennsylvania Department of Health
Medical Marijuana Grower/Processor Permit Application

Civil and Administrative Action

<table>
<thead>
<tr>
<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>
</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>
</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>
</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>
</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>
</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
- Timetable outlining the steps required for the applicant to become operational within six months from the date of issuance of a permit

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

[Yes] [No]

Section 8 – Operational Timetable

If issued a permit, please describe below the steps and timeframes for becoming operational as a grower/processor within six months from the date of issuance of a grower/processor permit.

Specifically, provide the steps you will take to begin the process for the growing, handling, processing, testing, transporting, and disposing of medical marijuana and medical marijuana products.

<table>
<thead>
<tr>
<th>Activity</th>
<th>Estimated Date</th>
</tr>
</thead>
<tbody>
<tr>
<td>Department awards permit to company</td>
<td>9/1/17</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>
</tbody>
</table>

If more space is required for the Operational Timetable, please submit additional information in a separate
Section 9 – Employee Qualifications, Description of Duties and Training

<table>
<thead>
<tr>
<th></th>
<th>Please provide a description of the duties, responsibilities, and roles of each principal, financial backer, operator and employee.</th>
</tr>
</thead>
</table>
| 1. | Chief Medical Officer: Dr. Kibibi Gaughan  
As Chief Medical Officer Gaughan is in charge of overseeing all duties related to patient needs in the market and product manufacturing. The Chief Medical Officer gives direction to the medical advisory board and the lead manager in the Cultivation center. |
| 2. | Chief Financial Officer: Brian Ammerman  
The Chief Financial Officer reports directly to the CEO and works with the COO in assisting on all strategic matters relating to budget management, cost benefit analysis, patient forecasting and daily Cultivation expenses. |
| 3. | Chief Executive Officer: Dr. Glen Mesaro  
The Chief Executive officer is the leading role in the Cultivation center. Mesaro is in charge of overseeing the COO and CFO and the growth and direction of the Cultivation. As well the CEO acts as the main point of communication between the executive board, upper Cultivation management and State officials. |
| 4. | Chief Operations Officer: George Archos  
The Chief Operations officer will oversee all aspects of operations. From cultivation construction to daily growing schedules, Archos will be hands on and direct the day-to-day operations of the Cultivation center. As well, Archos will work directly with the facilities general manager and report to the CEO |
| 5. | General Manager: Laura DeMaio  
The General Manager is the lead person in regards to daily operations within the Cultivation. The GM will work directly with the floor leads in making sure all patients are taken care of and the all State guidelines and regulations are met. |
| 6. | Patient Outreach: Lois Mease  
The Patient Outreach individual is in charge of hosting weekly patient events within the greater community. The events focus on not only the benefits of medical cannabis but on how patients can receive their medical cards. As well, Mease will work directly with local cultivation in helping them host community events and inform them of our various products we create at the cultivation venter. |
| 7. | Medical Marijuana Research: Marla Dorf  
As the head medical Marijuana researcher Dorf, is in charge of being up to date on all relevant research in regards to strains, products and patient studies. Dorf will work directly with the |
cultivation manager and head horticulturist in efforts to propel our breading and research program.

8. Community Relations: Maryann Keith
   - The Community Relations officer is in charge of enacting the community benefits program and working with various community leaders. Keith will work to make sure the benefits program is implemented within the community. As well, Keith will work directly with the patient outreach leader and store manager in relaying all information from the community.

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

1. KIBIBI A.M. GAUGHAN, M.D.:
   A proud resident of Lebanon, PA and currently a physician at Wellspan Family Medicine and Medical Director for Wellspan Good Samaritan Hospital Home Health in Lebanon, Dr. Gaughan earned her undergraduate degree at Boston College and her MD at American University of the Caribbean. She successfully completed her Family Medicine residency at UMass Memorial hospital. A wife and mother of two children, Dr. Gaughan is on the Personnel Committee at Lebanon Country Club. Charitably, she actively supports: Development & Disability Services of Lebanon Valley, the United Way, and Young Survivors Coalition (Breast Cancer). She is a faithful parishioner at St. Paul the Apostle Church in Annville, PA. Dr. Gaughan has a very personal connection to this venture, as her mother suffers from Multiple Sclerosis and deals with muscular pain daily. In addition, Dr. Gaughan sees patients of all ages who are in pain but are unable to tolerate prescription medication – many of whom would benefit greatly from medical marijuana.

2. Brian Amerman grew up in Sunbury Pennsylvania after moving to Sunbury from Baltimore when he was four years old. He attended school in the Shikellamy school district. After high school, he attended Penn State and graduated from PSU in 1983. He then moved to Baltimore to work for what is now called Ernst and Young. After five years in Baltimore, Brian’s father and he bought a small accounting practice in Lebanon Pennsylvania and he has been self-employed and managing the practice since 1988. He has 10 employees and specializes in accounting and tax work for a variety of small businesses. He also helped found and later sell an Internet business that was known as SunLink. Brian’s experiences in business, in both running his own business and helping clients with theirs, will help tremendously should the company be successful in the application process.

Brain was diagnosed with Hodgkin's disease in 1976 and had surgery to remove the tumor in late 1976. He then underwent radiation therapy throughout the winter and into the spring of 1977. He had an additional surgery in 1981 but the lump they removed this time was benign fortunately. He has a genuine desire to make medical cannabis safe and available for those who need it. There was anecdotal evidence when he was treated for cancer that it could help improve appetite and keep you strong during radiation and chemotherapy. He began to try marijuana after radiation therapy and it helped immensely in terms of appetite and maintaining strength during therapy.
Brian and his wife have raised three children in Lebanon Pennsylvania and plan on remaining Pennsylvania residents for the foreseeable future. His oldest son now works for the family accounting practice, his daughter is in her second year at the Ohio State University School Of Veterinary Medicine, and his youngest son is a sophomore at Millersville University.

3. Dr. Glen Mesaros is a practicing otolaryngologist/head and neck surgeon in the Lebanon community. He Graduated from Harvard University with Honors in 1986 and then completed his medical training at the University of Pittsburgh Medical School in 1992. While at medical school, he also obtained a Masters degree in Pathology for his research in molecular biology. Dr. Mesaros entered the military for his specialty training and spent six years at Fort Lewis, Tacoma Washington. He stayed on as a staff otolaryngologist at Madigan Army Medical Center and was responsible for the continuing development of residency training. He was then transferred to West Point Military Academy as Chief, Otolaryngology at Keller Army Medical Center. Dr. Mesaros left the military to come to Lebanon PA to raise his family and be a part of the community. He is co-owner of Flex Health and Wellness in Cleona, providing holistic nutritional services and products to the community. In 2015 he founded the Swing for the Troops charity to support local veterans in need. Dr. Mesaros is very involved with treatment and care of patients with advanced cancer of the head and neck.

4. George Archos has an extensive background in restaurants, logistics and the medical cannabis industry. Mr. Archos is currently the CEO of Ataraxia Grow and Labs located in Illinois and was the first to receive authorization to grow medical cannabis out of 21 recipients of the coveted medical cannabis licenses. Mr. Archos also owns and operates six well-known and highly successful restaurants including Wildberry Pancakes & Café, Westwood Tavern & Tap and the Scout Waterhouse & Kitchen. With an emphasis on quality and customer experience his establishments have received multiple awards and recognition throughout the Chicagoland area. In addition Mr. Archos also has over seven years of experience in logistics moving crude oil and freight throughout the US and Canada. With sales in excess of $200 million per year and multiple locations throughout the US, Mr. Archos has the knowledge and capability to build, establish and efficiently run companies in a variety of areas and states.

In addition to these companies Mr. Archos also has a background in real estate development and working with various municipalities in gaining government approvals and working together through the construction process of multiple projects.

Through these various businesses Mr. Archos gives back to surrounding communities through charitable donations and volunteer work. He is also closely associated with the Boys and Girl Club and has helped them expand their programs over the years and build nutritional menus for their members.

5. LAURA DEMAIO, OD:
I am an Optometrist who trained at the Pennsylvania College of Optometry. My husband and I have 2 children, ages 23 and 20. For the past 20 years, I have lived and worked in Lebanon, Pennsylvania. I have worked at Bouquet Mulligan DeMaio Eye Professionals, which has offices in Cleona and Elizabethtown, PA. My business consists of a very busy optometric practice, as well as
a state of the art retail optical business. Our business has revenues of 6 million dollars per year. I am very active in the local eye care community, as I provide free eye examinations for patients referred to me by the local free medical clinic. I am very interested in offering my glaucoma patients a possible cannabis treatment option, especially when they are failing our existing forms of treatment. I also have an autistic nephew who resides in Lebanon. I would be very interested to see if cannabis derivatives could be used to help him develop his verbal skills.

6. Lois Mease is a service oriented Registered Nurse with more than 25 years background in a large Veterans Medical Center. Her core competencies include compassion, caring and adaptability, as well as excellent communication and time management skills. Lois handles tasks with accuracy and efficiency.

7. MARLA DORF:
Overcoming the obstacles in life is a challenge that we must all face. Whether these challenges are the result of a congenital disorder, or medical affliction later in life, the aid of a compassionate voice can make all the difference. Making a difference has always been Marla’s goal. Receiving a bachelor’s degree in elementary education, Marla’s personal involvement with young children only increased her desire to help others.

Whether it was tutoring a thirteen year old quadriplegic, or assisting the participants in a program for special needs at the North Shore Special Recreation Association (NSSRA). Marla’s goal has always been to make a difference in someone’s life.

Marla’s battle with breast cancer opened a new window in her crusade. She now had to find a way to help others battling cancer. Marla founded the Hearts For Research Foundation, and began successfully raising funds for cancer research. Marla was also an avid supporter of the Y-Me organization, participating in organizing large groups for cancer walks and charity pizza sales.

Marla’s never ending quest for helping others and sharing her compassion took another turn in 2014. She was introduced to the Compassionate Care Act, a statute that allowed the use of medical cannabis in the State of Illinois. Marla’s research in the uses of medical cannabis in the treatments of cancer resulted in her insisting that her family get involved. This involvement has resulted in her family’s participation in multiple states medical cannabis programs.

The achievements of her life have continued to feed her desire to make a difference.

8. MARYANN E. KEITH:
Pursuing a degree in Education from Penn State University in Happy Valley was instrumental not only in finding my life partner, but also exposing me to vast opportunities, experiences and thought processes that would shape my life’s vision. Being married to Kevin, a Wealth Management Advisor for Merrill Lynch, enabled me to live one of my most important life goals of being a full-time Mom for our three sons. My insatiable desire to interact with others, be involved, and be productive led me to delve into many causes over the early years. Beginning with transforming a coveted, private Jack & Jill Preschool/Kindergarten program into a non-profit organization, raising funds for the National Multiple Sclerosis Society Leadership Class, to leading
organizations such as the Newcomer's Club and the Penn State Club of Lebanon during the early years.

Since establishing this pattern, I have enthusiastically continued to participate and embrace many school, athletic, church, civic, social and community organizations through the years. Actively serving on committees as a board member, officer and oftentimes the fundraising chair...it became my life's "work". Throughout our sons' school years, the family became involved in the American Cancer Society's Relay for Life, and our team, Dog's Dawgs, became one of the top fundraising teams in the state of Pennsylvania for ten years. Philanthropy became a passion and a way of life that inspired me to reach beyond places I ever thought I would experience.

Volunteering through our son Tyler's Boy Scout Troop, I became involved in an extraordinary international non-profit organization called American Foundation for Children with AIDS. AFCA's mission is to raise funds for medicine, and to gather supplies and medical equipment to be shipped in cargo containers to 25 clinics we serve in sub-Saharan African countries. All in order to provide hope and health to HIV+ children and their families. In July 2012, I had the extreme fortune and opportunity through AFCA to Climb Mt. Kilimanjaro in Tanzania Africa, as part of a fundraiser called "Climb Up So Kids Can Grow Up". Capping off this remarkable event, our team was able to visit and volunteer in one of the clinics we serve in Mombasa, Kenya immediately following the Climb. It was incredibly amazing to see the difference AFCA made in the lives of these children with the money we had raised. These children NEVER would have received so much without the generous spirit of so many. I saw poverty I never thought was possible, living conditions that were deplorable, but most importantly, hope, faith and a strength in the human spirit that warmed my heart beyond belief. I am still involved with this life-changing organization today.

My philanthropic trail has most recently led me to become involved in another amazing international non-profit organization called Girls on the Run. It is a physical activity-based, positive youth development program for girls in third through eighth grade which enhances girls’ social, psychological, and physical competencies. We believe that every girl can embrace who she is, define who she wants to be, can rise to any challenge, and CAN change the world. I am presently the ambassador and leader of the grass roots expansion of this organization in Lebanon County.

My life now is spent with my husband Kevin, living in Lebanon, supporting his business endeavors and helping them expand through assisting with client development and relationships. We often visit our three grown sons, Chris, Brian and Tyler, in Denver Colorado, New York City and Washington D.C. and have learned so much about new places they are now showing US! I am an avid competitive tennis player and recently started learning yoga. Kevin and I enjoy traveling abroad, hiking through National Parks, skiing in Colorado, cycling the Lebanon Valley Rail Trail with friends and still rooting for our favorite football team...the Penn State Nittany Lions!
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, 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 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 PRODUCTS.

Please provide a summary of your proposed security and surveillance equipment and measures that will be in place at your proposed facility and site. These measures should cover, but are not limited to, the following: general overview of the equipment, measures and procedures to be used, alarm systems, surveillance system, storage, recording capability, records retention, premises accessibility, and inspection/servicing/alteration protocols.
DOH REDACTED
Section 11 – Transportation of Medical Marijuana

A. Transportation

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 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.
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- 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 electronic) that accompanies every transport vehicle will contain the following information and meet the following requirements:

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

- The name, address and permit number of the medical marijuana organization 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
Pennsylvania Department of Health
Medical Marijuana Grower/Processor Permit Application

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.

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

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

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

<table>
<thead>
<tr>
<th>A. Storage Requirements</th>
<th>Yes</th>
<th>No</th>
</tr>
</thead>
<tbody>
<tr>
<td>By checking “Yes” to any statement, you affirm that the plan of operation will address the below statements:</td>
<td></td>
<td></td>
</tr>
<tr>
<td>If you check “No” to any statement, you must state the reasoning for doing so at the end of this section. If issued a permit, you must be able to affirm each statement by the time the Department determines you to be operational under the Act and regulations.</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>
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:
DOH REDACTED
DOH REDACTED
Pennsylvania Department of Health
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DOH REDACTED
Section 13 – Packaging and Labeling of Medical Marijuana

<table>
<thead>
<tr>
<th>A. Packaging Requirements</th>
<th>Yes</th>
<th>No</th>
</tr>
</thead>
</table>
Pennsylvania Department of Health
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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.

- Any resemblance to the trademarked, characteristic or product-specialized packaging of any commercially available food or beverage product.
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- 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.

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:

- Be easily readable.

- Be made of weather-resistant and tamper-resistant materials.

- Be conspicuously placed on the package.

- Include the name, address and permit number of the grower/processor.

- List the form, quantity and weight of medical marijuana included in the package.

- List the amount of individual doses contained within the package and the species and percentage of THC and CBD.

- 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.

- 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.
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<table>
<thead>
<tr>
<th>Requirement</th>
<th>Yes</th>
<th>No</th>
</tr>
</thead>
<tbody>
<tr>
<td>List the date of expiration of the medical marijuana.</td>
<td>☒</td>
<td>☐</td>
</tr>
<tr>
<td>Include instructions for proper storage of the medical marijuana in the package.</td>
<td>☒</td>
<td>☐</td>
</tr>
<tr>
<td>Contain a warning that the medical marijuana must be kept in the original container in which it was dispensed.</td>
<td>☒</td>
<td>☐</td>
</tr>
<tr>
<td>Contain a warning that unauthorized use is unlawful and will subject the purchaser to criminal penalties.</td>
<td>☒</td>
<td>☐</td>
</tr>
<tr>
<td>Contain the following warning stating:</td>
<td>☒</td>
<td>☐</td>
</tr>
<tr>
<td>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.</td>
<td>☒</td>
<td>☐</td>
</tr>
</tbody>
</table>

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

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:

Lebanon BioPharma 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 licensed in Illinois, Nevada and Maryland.

Lebanon BioPharma 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, Lebanon BioPharma’s 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:

1) Upon the conclusion of the curing process (cured medical marijuana will be bulk-packaged while awaiting internal and independent testing results)
2) Upon the conclusion of the extraction process (extracted medical marijuana will again be bulk-packaged while awaiting internal and independent testing results)
3) Upon the conclusion of the infusion process (infused medical marijuana products will again be bulk-packaged while awaiting internal and independent testing results)
4) 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)
5) 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 transportation)

Lebanon BioPharma’s inventory department will always package medical marijuana in a package that minimizes exposure to oxygen and that is:

1) Child-resistant
2) Tamper-proof or tamper-evident
3) Light-resistant and opaque
4) Resealable

Label-Making System

All labels created must be indelible and tamper-evident and will be made of weather-resistant material. To ensure this, Lebanon BioPharma 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 of the facility.
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), Lebanon BioPharma 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.

Lebanon BioPharma 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, Lebanon BioPharma will inspect each label to ensure it properly identifies:

1) The name, address, and permit number of Lebanon BioPharma  
2) The form of medical marijuana in the package  
3) The quantity of medical marijuana in the package  
4) The weight of medical marijuana in the package  
5) The species of medical marijuana  
6) The amount of individual doses contained within the package  
7) The percentage of THC and CBD (and other cannabinoids present in accordance with independent testing results)  
8) The unique harvest batch numbers identified assigned to the medical marijuana, including the unique harvest lot and process lot numbers  
9) The date of packaging  
10) The employee identification number of the employee preparing the package and packaging the medical marijuana  
11) The employee identification number of the employee shipping the package, if different than the employee preparing the package and packaging the marijuana  
12) 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)  
13) The date of expiration of the medical marijuana  
14) Instructions for the proper storage of the medical marijuana in the package  
15) Any other information required by the Department

All labels will also include the following warnings:

1) “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.”

2) “Medical marijuana must be kept in the original container in which it was dispensed.”

3) “Unauthorized use of medical marijuana is unlawful and will subject the purchaser or user to criminal penalties.”

For ease of entry into the Lebanon BioPharma 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. Lebanon BioPharma will also inspect each label to ensure that the label does not bear:

1) Any resemblance to the trademarked, characteristic or product-specialized packaging of any commercially available food or beverage product

2) Any statement, artwork or design that could reasonably lead an individual to believe that the package contains anything other than medical marijuana

3) 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

4) Any cartoon, color scheme, image, graphic or feature that might make the package attractive to children

Lebanon BioPharma 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
Lebanon BioPharma 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, Lebanon BioPharma 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:

1) The name, address and permit number of the grower/processor (i.e., Lebanon BioPharma) and the name of and contact information for a representative of Lebanon BioPharma who has direct knowledge of the transport
2) 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

3) 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

Lebanon BioPharma will provide a copy of the transport manifest to the recipient receiving the medical marijuana described in the transport manifest. To maintain confidentiality, Lebanon BioPharma may prepare separate manifests for each recipient. Lebanon BioPharma 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.
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, Lebanon BioPharma 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, Lebanon BioPharma will take one of the following actions, depending when the unfit label was first identified as such:

1) The product will be rejected and returned to product packaging room for proper re-labelling
2) Lebanon BioPharma will quarantine the product for further inspection and either:
   a) Create and affix a compliant label if the product itself is determined to be safe for dispensation but was simply mislabeled, or
   b) 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 Lebanon BioPharma’s electronic inventory tracking and recordkeeping system, including the unique employee identification number of the agent completing these actions.

**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:
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1) Learning required information that must appear on each label created by our organization
2) Creating and affixing compliant labels using our label making equipment
3) 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)
4) Confirming the presence of a barcode that allows for accurate scanning of each medical marijuana package into the electronic inventory tracking and recordkeeping system
5) 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 Lebanon BioPharma 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>
</tr>
</thead>
<tbody>
<tr>
<td>You acknowledge that you must use the electronic tracking system prescribed by the Department containing the requirements in section 701 of the Act (35 P.S. § 10231.701).</td>
<td>✗</td>
<td>☐</td>
</tr>
<tr>
<td>You acknowledge that an electronic tracking system that is approved by the Department will be deployed to log, verify, and monitor the receipt, 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 marijuana.</td>
<td>✗</td>
<td>☐</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>B. Inventory Management</th>
<th>Yes</th>
<th>No</th>
</tr>
</thead>
<tbody>
<tr>
<td>By checking “Yes” to any statement, you affirm that 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:</td>
<td>✔</td>
<td>☐</td>
</tr>
<tr>
<td>If you check “No” to any statement, you must state the reasoning for doing so at the end of this section. If issued a permit, you must be able to affirm each statement by the time the Department determines you to be operational under the Act and regulations.</td>
<td>✔</td>
<td>☐</td>
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</table>
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- 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
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Section 15 – Management and Disposal of Medical Marijuana Waste

<table>
<thead>
<tr>
<th>A. Medical Marijuana Waste</th>
<th>Yes</th>
<th>No</th>
</tr>
</thead>
<tbody>
<tr>
<td>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).</td>
<td>☒</td>
<td>☐</td>
</tr>
</tbody>
</table>

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):
DOH REDACTED
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:**

[Redacted]
DOH REDACTED
### 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.

<table>
<thead>
<tr>
<th>Yes</th>
<th>No</th>
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- 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

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| 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**
Lebanon BioPharma 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.

Lebanon BioPharma 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. In the event that application of pest controls becomes necessary, Lebanon BioPharma 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). Lebanon BioPharma 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**
Through the prevention, exclusion, treatment and monitoring of pests, Lebanon BioPharma’s 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. Lebanon BioPharma employees will be trained in our prevention methods (including exclusion and routine scouting) to help avoid future pest outbreaks.

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

1) The date of application; For a pesticide requiring a re-entry time, the date of application must include the hour completed
2) The place of application, including the specific block, section, or immature medical marijuana plants or medical marijuana plants treated
3) The size of the area treated
4) The product name of every pesticide used
5) 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)
6) The total amount of every pesticide used in pounds, ounces, gallons or liters applied to a treated area
7) The dosage or rate of application of every pesticide used
8) 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
9) Copies of pesticide labels and Safety Data Sheets for the pesticides used at the facility

Lebanon BioPharma 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.

Pesticides Used in the Growing Process

1) Pyganic
   - Description: Pyrethrin is an organically compliant, broad-spectrum contact insecticide that offers gardeners peace of mind with its rapid kill of unwanted insects.
   - Application: Applied to crown of the pots and the surrounding table and floor area. Foliar application if heavy infestation.

2) Azamax
   - Description: Azadirachtin OMRI LISTED. A botanical insecticide extracted from seeds of the neem tree, Azadirachta indica, provides broad spectrum insect and mite control and works in the suppression of root knot nematodes.
3) Gnatrol
   - Description: Gnatrol (Bacillus Thuringiensis) is a very specific pesticide that kills flies in the soil, its main use is for fungus gnat control.
   - Application: Root drench

4) Nuke ‘Em by Flying Skull
   - Description: Its target is all species of Spider Mites, Thrips, Whitefly, Mealy Bugs and other plant insect parasites. Insects, mildew and mold can't become immune to Nuke Em's effects. Its unique formula is comprised of 100% food grade ingredients that are commonly found in every day food products like bread.
   - Application: Foliar spray application

5) Trilogy
   - Description: Clarified hydrophobic extract of neem oil to prevent pests/pathogens and disease.
   - Application: Foliar spray application.

6) Deterrents
   - Description: 100% Organic extract of Garlic, Clove, Cinnamon, Peppermint, and Rosemary oil.
   - Application: Diluted in water, sprayed on floors and tables to deter pests.


Overview
Lebanon BioPharma is committed to implementing proven SOPS’s which create a process that delivers contaminant-free, pharmaceutical-grade medical marijuana that is safe for patients. All operations will be conducted in 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.

Lebanon BioPharma 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 Argus Control system dedicated to each room. Conditions will be adjusted to the specific needs of the strains being grown and the phase of growth at hand.

**Propagation**
At the entrance of the propagation area, we will employ an air curtain, a foot bath, positive pressure to prevent contaminants from entering and will require every person to spray down with isopropyl alcohol prior to entering the room. At the end of each day all working surfaces must be sanitized with a weak acid solution. 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 3% H2O2 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’ Infinity Linear LED lights for the rooting clones and seedlings and Mother Plants will be kept in 10-gallon pots under Gavita. All lights in this area will run 24/7.

**Germination**
To germinate seeds, they will be soaked in a 3% hydrogen peroxide sterilization solution, rinsed in reverse osmosis (R/O) water, then soaked in Kelp extract. Soaked seeds will be planted in trays filled with a wet 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. Infinity Linear LED’s will provide light for the seedlings. Vents on top of the dome are manipulated to regulate moisture. 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 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 Lebanon BioPharma will only keep the strongest genetics. Information related to the discarded seedlings and seeds is recorded in our inventory tracking system.

**Cloning**
Mother Plants are the source of new plant stock and their care and health is critical importance to the survival of their offspring. 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.

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. 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.

New, unrooted clones will be placed in an EZ-cloner machine (or similar machine) filled with R/O water and rooting solution. EZ-cloners are organized off the ground on wire shelving racks, lit by Infinity Linear LED fixtures. 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 pots filled with growing medium. Sterilized scissors will be used to trim away any weak and lower leaves.

We will mix mycohorrizae into our growing medium before transplant and bring it to 50% moisture level by inoculating our 3-gallon pots with our proprietary blend of beneficial microorganisms during transplant. Thereafter, plants will be inoculated with beneficial microbes through hand watering at least 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 H2O2 solution and pump operated for 24 hours to fully sterilize all surfaces. After H2O2 soaking, the machine is then rinsed and allowed to air dry.

**Cultivation**

The life cycle of a medical marijuana plant is comprised of two phases: vegetative and flowering phases. Environmental conditions during all phases will be controlled by an Argus Control 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.

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 Gavita system fixtures. Lebanon BioPharma prefers these lighting systems as we have vast experience with them in our affiliate facilities cultivating medical marijuana in Illinois and Nevada.

During vegetative phase of growth, lights will be on 18-20 hours, depending on the strain being cultivated. 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: 1200-1500 ppm.

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 will be 8 weeks long (we will use varietals which fully mature within this time frame to maintain efficient operations and a steady supply of fresh products).

While in flowering, 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. Lower leaves are removed to promote good ventilation, thus reducing leaf density and humidity traps. Which also helps during pest scouting and channels the plant’s energy to the fruiting branches. 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 Lebanon BioPharma 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.) are 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. Lebanon BioPharma 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 Pennsylvania Department of Health (the Department).

**Growing Mediums and Hydroponics**

Lebanon BioPharma 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. Plants will be fed up to 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. 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.

**Nutrient Practice**

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. Lebanon BioPharma 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**
Pre-harvest protocols include removal of all fan leaves and flushing plants the last 7-10 days prior to the anticipated harvest date and monitoring trichome development. 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. 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 as a “batch” for tracking purposes.

Trimming
Upon arrival at the trim room, properly dressed agents will remove the flowers from all branches. 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.

Lebanon BioPharma 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 and will be properly sanitized with acetic acid 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.

Lebanon BioPharma 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. Trimmed leaves and stems are saved for extraction and taken to a freezer to be preserved.

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 and UVC lighting.
- Humidifiers and dehumidifiers to maintain humidity within the desired range
- Argus Control system controller to manage atmospheric settings

Temperature will be maintained below 64°F using the Argus Controller to optimally stabilize cannabinoid and terpene chemical structure. Humidity will be controlled to dehydrate and preserve the flowers. 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 manipulate the remaining moisture content of the medical marijuana 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 the product.

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 Argus Control system controller that will automatically control environmental variables, including activating the HVAC system to regulate temperature as needed.

As relative humidity within the curing containers fluctuates, agents will “burp” containers to maintain desired humidity levels and to allow the air within the containers to exchange and gases to be released. Sufficient burping will lead to the highest quality finished product if done correctly. When flowers are determined to be properly cured, the batch 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. Lebanon BioPharma 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.

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.

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 sterilize all equipment in the water treatment area 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.

All components of our irrigation equipment (e.g., drip emitters, irrigation lines, pumps, etc.) will be cleaned weekly using acetic acid solution. 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 foombath 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 with isopropyl alcohol on their way in and out of any rooms containing plants or products to prevent pests/pathogens and/or disease contamination. 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 3% H2O2 solution weekly
- Grow tables cleaned of debris daily and wiped with weak acid solution weekly, then sprayed with a 3% H2O2 solution.
- Door entry mechanisms and other high contact surfaces sanitized with weak acid solution 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, Lebanon BioPharma 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

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<thead>
<tr>
<th>A. Nutrient and Growth Additive Practices</th>
<th>Yes</th>
<th>No</th>
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<tbody>
<tr>
<td>By checking “Yes” to any statement, you affirm that your facility will maintain the following medical marijuana nutrient and growth processes:</td>
<td></td>
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<td>If you check “No” to any statement, you must state the reasoning for doing so at the end of this section. If issued a permit, you must be able to affirm each statement by the time the Department determines you to be operational under the Act and regulations.</td>
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<tr>
<td>• Appropriate nutrient practices will be used.</td>
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<td>• A fertilizer or hydroponic solution must be of a type, formulation and at a rate to support the healthy growth of plants.</td>
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<tr>
<td>• Records of the type and amounts of fertilizer and any growth additives used will be maintained.</td>
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<tr>
<td>• 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.</td>
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<td>• Excipients will be pharmaceutical grade, unless otherwise approved by the Department.</td>
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PLEASE PROVIDE AN EXPLANATION OF ANY RESPONSES ABOVE THAT WERE ANSWERED AS A “NO” AND HOW YOU WILL MEET THESE REQUIREMENTS BY THE TIME THE DEPARTMENT DETERMINES YOU TO BE OPERATIONAL UNDER THE ACT AND REGULATIONS:

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

Below is a list of the nutrients and additives that will be fed to Lebanon BioPharma’s medical marijuana plants.

1) 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.

2) 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.

3) Athena’s Aminas
   - This provides a readily available source of L-amino acid to help optimize protein production and improve growth rates.

4) 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.

5) 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.
6) **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.

7) **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.

8) **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 aides in washing salt from soil-like media or soilless media, and we will use it as part of our soil flush solution.

9) **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.

10) **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.

11) **Poseidonzime**

    - 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.

12) **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.

13) **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.

14) **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.

15) **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.

16) **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.

17) **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

Lebanon BioPharma 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 Ataraxia of Illinois and Nevada Natural Treatment of Nevada.

Lebanon BioPharma processing and extraction will only 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:

1) Temperature
2) Humidity
3) Ventilation
4) Lighting
5) Water supply

Generally, within the first 6 months after the Pennsylvania Department of Health (the Department) determines Lebanon BioPharma to be operational, we will provide the Department with a forecast of the amount of medical marijuana we project we will 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 amount occurring within any subsequent 6-month period.

Lebanon BioPharma will ensure that, in the form intended to be sold to another medical
marijuana organization, our medical marijuana will have a specific concentration of total THC and total CBD, and a consistent cannabinoid profile. The concentration of the following cannabinoids, at a minimum, will be reported to the Department by an approved laboratory that tests our products and include the following on the label:

- Tetrahydrocannabinol (THC)
- Tetrahydrocannabinolic acid (THCA)
- Tetrahydrocannabivarin (THCV)
- Cannabidiol (CBD)
- Cannabinadiolic acid (CBDA)
- Cannabidivarine (CBDV)
- Cannabinol (CBN)
- Cannabigerol (CBG)
- Cannabichromene (CBC)
- Any other cannabinoid component at > 0.1%

**Extraction Technologies and Methods**

Lebanon BioPharma will produce extractions using CO2 Supercritical Fluid Extraction (SCFE). Supercritical CO2 produces medical marijuana extracts that are much safer, cleaner, less toxic and more aromatic than alternative extraction technologies. CO2 oil is also more cost efficient and more customizable in terms of its cannabinoid content, making it suitable to more mechanisms of delivery giving patients and practitioners more treatment options.

The Supercritical CO2 extraction process creates phase changes in carbon dioxide through the proper manipulation of the temperature and pressure parameters. A supercritical fluid (SCF) is any substance at a temperature and pressure above its critical point, where distinct liquid and gas phases do not exist (i.e., it is impossible to distinguish between the liquid and the vapor phases). Extraction processes using CO2 as a SCF do not contribute toward greenhouse gas increases in our atmosphere.

A SCF exhibits the properties of a liquid and a gas simultaneously, allowing it to effuse through solids like a gas, and dissolve materials like a liquid. Supercritical CO2 has almost no surface tension, so it easily penetrates the cuticle of medical marijuana’s trichomes, dissolving all the oils that it encounters on its path.

Using CO2 as a SCF eliminates the need for flammable petroleum based solvents such as propane, butane, etc., or other organic solvents that are harmful when inhaled, like benzene, toluene, hexane, etc. This makes CO2 extraction safer, removing the danger of explosions as well as potentially harmful solvent particles from the final, very concentrated medical marijuana product.

Our CO2 SCFE process delivers a pure, clean, pharmaceutical-grade extract (i.e., oil) that is safe to produce with little-to-no post-processing to ensure purity, unlike other toxic solvents that may require many hours to purge the solvent trapped in the resulting oil. As stated before,
multiple industries have proven that the highest efficiencies in commercial extraction processes utilize CO2.

In general, when the CO2 SCFE system is turned on liquid CO2 leaves its storage tank when the valve on top of the tank is opened. This liquid CO2 is sent to a compressor where it is further pressurized to CO2 supercritical pressure. This super pressurized liquid is fed to a heat pump that raises its temperature to CO2 supercritical temperature (approximately 87.98°F), turning it into a Supercritical Fluid.

This Supercritical CO2 is fed into an extraction vessel that is filled with dry, ground medical marijuana plant material. The Supercritical CO2 dissolves the medicinal cannabinoids, terpene oils and waxes out of the plant material, binding to them and dragging them in this Supercritical State to a separation vessel. The continuous feeding of Supercritical CO2 from the top of the extraction vessel forces the Super Critical CO2 (that now has the desired medicinal compounds attached to it), out from the bottom of the extraction vessel (after running through the plant material) and into the separation vessel.

The pressure inside the separation vessel is appropriately decreased, allowing the Supercritical fluid to drop its temperature and return to a gaseous state. The cannabinoids and terpenes that were dissolved in the SCF now turn to a liquid state and separate from the gaseous CO2. The medicinal compounds in the liquid state are heavier than CO2 gas and are collected at the bottom of the separation vessel. At this point, we will recapture the gaseous CO2, compressing it in the condenser into a liquid state and send it back to the storage tanks for re-use (a closed loop system).

**Extraction Equipment**

There are a few reputable manufacturers of CO2 SCFE equipment in the U.S. The best known are Waters, Eden Labs and Apeks. Lebanon BioPharma intends to use the Apeks 5000 PSI 40LX40LDP SYSTEM in our extraction laboratory because of its versatility and high yield capabilities.

The 5000 PSI operating pressure of this equipment allows for the shortest extraction times, with efficient extraction of medical marijuana oils without thermal degradation. This equipment runs at lower temperatures, helping with the preservation of terpenes and flavonoids.

This system is composed of two 40-liter extraction vessels capable of processing 25 to 30 lbs. of dry, ground material per run. It is also fully automated using Allen Bradley PLCs (Programmable Logic Controllers) and has a large touch screen that guides the user through the entire process, prompting for inputs of temperature and pressure on the different vessels. Upon each entry, the user is prompted to confirm the selection helping to avoid errors while entering the parameters for each run.
Another important feature of this equipment is that it automatically reverses the feed direction of Supercritical CO2 into the extraction vessels (it alternates top and bottom feeds). This helps to avoid the buildup of residue on the bottom of the extraction vessels, simplifying cleaning and maintenance between runs.

The control that system operators have over this equipment allows them the flexibility to choose the appropriate settings of temperature and pressure to target specific medicinal compounds during an extraction run. This gives processing agents the ability to target, isolate and capture specific medicinal compounds in the source medical marijuana material at different times of a run. More specifically, we plan on a short (about 30 minutes) subcritical conditions run to extract terpenes and lighter oils and then will change the settings to Supercritical values of temperature and pressure to target the cannabinoids and heavier oils.

We may also choose to run the system using fresh plant material (wet, non-cured). There is anecdotal evidence that supports the claim that wet runs increase the yields of terpenes and lighter oils without decreasing the yields of heavier cannabinoids.

Important features of this system include:

- The ability to process approximately 80-100 pounds of dried, ground medical marijuana in a 24-hour period
- Fully automated with a touch screen control for easy input of extraction parameters
- High yield 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
- Valveless Expansion Technology
- Widest supercritical range allowing operating pressures of up to 5000 Psi
- UL Listed

**Winterization and Post-Extraction**

The post-processing of the raw medical marijuana extracts (i.e., oil) produced with the Apeks 5000 PSI 40LX40LDP SYSTEM is streamlined since there is no need to separate (i.e., purge) the solvent. Separation of plant waxes is simple and achieved by mixing the raw extracts gathered on the collection cup of the separation vessel with an equal amount of food-grade 200 proof ethanol in a large beaker. The mixture will be stirred to make it more homogeneous and then covered and taken to a freezer with appropriate temperature settings. The mixture remains in the freezer 24-48 hours to allow the plant waxes to precipitate. After precipitation of the plant waxes, the mixture is filtered on a vacuum funnel using a paper filter to separate the solid phase (i.e., plant waxes).
The liquid phase after filtration is transferred to a round bottom flask and distilled using a rotovap with an appropriate temperature setting to only evaporate the 200-proof food-grade ethanol that is recovered through condensation on a vacuum distillation column. When there is no more ethanol dripping on the distillation column, the process is completed. The contents of the round bottom flask are only pure de-waxed medical marijuana oil. The resulting transparent oil is pharmaceutical quality and can actually be administered as is to a patient (it is an oil product appropriate for patient administration, subject to testing and proper packaging).

The resulting medical marijuana oil is rich in terpenes collected running the Apeks 5000 PSI 40LX40LDP SYSTEM under subcritical conditions. This short run avoids losing these volatile medicinal compounds and preserves the “entourage effect” (i.e., the natural chemical synergies found on unprocessed plant material).

Decarboxylation
Medical marijuana plants produce phytocannabinoids in acidic form, which are not readily absorbed by humans, at least at the CB-1 receptor sites. These compounds need to undergo decarboxylation before they can be efficiently absorbed. Decarboxylation is a chemical reaction that releases CO2. This means a chemical reaction takes place in which carboxylic acids lose a molecule of CO2. This process converts all acidic form of cannabinoids into their neutral forms that can be absorbed by CB-1 and CB-2 receptors.

The two main catalysts for decarboxylation to occur are heat and time. Drying and curing medical marijuana over time will cause a partial decarboxylation to occur, however Lebanon BioPharma will use special equipment to increase decarboxylation efficiency.

Decarboxylation Equipment
We will decarboxylate our medical marijuana raw material (dry or wet) prior to extraction using a Cascade Botanicals Drying Oven Model CDO-28. This oven is ideal for decarboxylation of plant material prior to extractions. The CDO (Cascade Drying Oven)-28 has a capacity of 28 cubic feet and is able to accommodate roughly 50 pounds of plant material on each 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
The THCA in medical marijuana begins to decarboxylate at approximately 220°F after around 30-45 minutes of exposure. Full decarboxylation requires more time to occur. Knowing these
facts, we will pre-heat the CDO-28 to 240-250°F, load our medical marijuana plant material into the temperature rated mashed bags and set the program timer for an appropriate period of time to achieve maximum results.

Decarboxylating the plant material prior to extraction decreases extraction run times, increases yields and improves the color of the final extracts. It is also easier to decarboxylate plant material in the CDO-28 prior to extraction than to decarboxylate medical marijuana oils in post-processing.

**Medical Marijuana Products**

Lebanon BioPharma 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.

Generally, Lebanon BioPharma 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.

Lebanon BioPharma will only process the parts of the medical marijuana plant that:

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

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

Lebanon BioPharma’s product line will at first be limited to those currently permitted by law:
Pennsylvania Department of Health
Medical Marijuana Grower/Processor Permit Application

1) Oil
2) Pills
3) Topical forms, e.g., gels, creams, oils and ointments
4) Tinctures
5) Liquids, e.g. sublingual sprays
6) 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 Lebanon BioPharma 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
We will manufacture HPMC (Hydroxypropylmethyl cellulose) capsules and Extended Release (Enteric-Acid Resistant) capsules. 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.

Topicals
Medical marijuana topical product forms include gels, creams, oils and ointments which are infused with active cannabinoids and are applied to and absorbed directly through the skin. 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 are essentially an alcohol- or glycerin-base liquid mixture. The most efficient way to use medical marijuana tinctures are sublingually. With tinctures, the dose or the titration can be easily controlled by counting the number of drops under the tongue where the medication can be rapidly absorbed into the vascular system. Sublingual administration has certain advantages over oral administration. 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
Medical marijuana liquid can be administered as sublingual sprays. This ethanol based product can be more effective than tinctures because of the smaller particle size of the spray droplets and the greater surface area of absorption, as compared to measured tincture drops.

Pre-Filled Vaporizer Cartridges
Lebanon BioPharma’s winterized extracted medical marijuana oils, after separation (using a vacuum distillation column) from 200 proof food grade ethanol 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. 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.

Section 20 – Sanitation and Safety

Sanitization and Safety
Lebanon BioPharma 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. Lebanon BioPharma 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, Lebanon BioPharma 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:
1) 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.

2) Equipment and utensils will be made of materials that can be adequately sanitized and cleaned.

3) Equipment, counters and surfaces for processing must be food grade quality and may not react adversely with any solvent being used.

4) Trash will be properly removed at least once daily, and more often as necessary.

5) Floors, walls, and ceilings will be kept in good repair.
   a) Staff will inspect the interior of the facility as part of opening procedures and will immediately report to management any issues observed or suspected.
   b) Upon notification of an issue, management will immediately repair the affected floor, wall, or ceiling.

6) 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.
   a) Staff will regularly inspect the premises for signs of pest infestation and will immediately report to management any issues observed or suspected.
   b) When and where necessary, we will install door sweeps, utilize sticky traps, and apply safe pest prevention and management products.

7) 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.

Facility Perimeter

Contaminants can be introduced by any number of materials, including water and new plant stock in the form of cuttings, seedlings or seeds, entering the facility, people and/or systems that exchange air with the perimeter of the facility. Therefore, our plan to prevent contamination starts outside our facility with an exclusion zone on the outer perimeter. In this area, there will be no trees or shrubs, garbage dumpsters, or any other environmental factor introduced that could foster spread or growth of microorganisms or spores. This exclusion area will be fenced in and will include a manned check point to control everything entering the facility.

Lebanon BioPharma will place traps for rodents outside the building, and the building will be designed so that birds and any other animals will not be able to seek shelter from the elements on the outside walls or roof. Motion detectors will activate Sonic Bird Control Devices to keep birds away. Cameras will monitor the exclusion zone and any potential carrier of contamination will be detected before getting close to the building.

Prevention of Contaminants Entering the Facility

Lebanon BioPharma 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 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**

Lebanon BioPharma 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 regularly tested 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**

The systems that exchange air with the perimeter of the facility (e.g., heating, cooling and air circulation) will all 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**

Lebanon BioPharma 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 have 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 employees’ 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 also 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 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**

Lebanon BioPharma 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, Lebanon BioPharma 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). Lebanon BioPharma 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, Lebanon BioPharma will maintain a record of each application that includes:

1) The date of application; for a pesticide requiring a re-entry time, the date of application must include the hour completed
2) The place of application, including the specific block, section, or immature medical marijuana plants or medical marijuana plants treated
3) The size of the area treated
4) The product name of every pesticide used
5) 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)
6) The total amount of every pesticide used in pounds, ounces, gallons or liters applied to a treated area
7) The dosage or rate of application of every pesticide used
8) 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
9) Copies of pesticide labels and Safety Data Sheets for the pesticides used at the facility.

Lebanon BioPharma 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 4 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 2-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**
Lebanon BioPharma 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:

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

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

Lebanon BioPharma 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

Lebanon BioPharma intends to immediately and effectively eradicate any plant pest found at our facility. However, should Lebanon BioPharma 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 Lebanon BioPharma 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, Lebanon BioPharma 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 Lebanon BioPharma.

Department Quarantine Orders

Lebanon BioPharma 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.

Lebanon BioPharma 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. Lebanon BioPharma’s 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
Lebanon BioPharma 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:

1) Maintaining adequate personal hygiene
2) Wearing proper clothing, including gloves
3) 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, breakrooms 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

Lebanon BioPharma 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, Lebanon BioPharma 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, Lebanon BioPharma 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.

Lebanon BioPharma 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, Lebanon BioPharma 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
Lebanon BioPharma 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. 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:

1) 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)
2) Segregating the employee from interacting with other persons and prohibiting them from handling medical marijuana
3) Sending the subject employee home for the day to rest
4) Advise the subject employee visit the emergency room or medical specialist

If the condition is more serious, the subject employee will be asked to refrain from returning to the 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.

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.

Lebanon BioPharma will develop and implement a plan to use established recordkeeping procedures adopted, and modified accordingly, from our medical marijuana industry affiliates.
in Illinois, Nevada and Maryland. In accordance with protocol and with 28 PA Code §1151.30 (regarding inventory data) and 28 PA Code §1151.36 (regarding transport manifest), Lebanon BioPharma will create and maintain written and/or electronic records, as appropriate, and securely store them for a period of at least 4 years. In addition, in accordance with 28 PA Code §1151.39 (regarding electronic tracking system), Lebanon BioPharma 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 and sales transaction records, Lebanon BioPharma will utilize the BioTrack THC inventory tracking and recordkeeping software system (or a similar system capable of integrating with the Pennsylvania Department of Health’s (the Department) electronic tracking system). BioTrack THC is a widely utilized, proprietary seed-to-sale inventory tracking and recordkeeping system currently used by our medical marijuana industry affiliates.

BioTrack THC has the capability to track products from receipt from seed to sale, allowing for accurate real-time inventory records. Upon entering a product into the system, a unique product number will be issued for tracking and recordkeeping purposes. All actions taken to inventory as whole, by grouping, or by individual product will be digitally recorded for instant and long-term analysis purposes. Moreover, detailed sales records can be stored for several years. BioTrack THC 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 BioTrack THC to track and record all actions related cultivating, processing, packaging, labeling, handling, storing, transferring, and transporting medical marijuana products in accordance with all applicable laws, rules, and regulations. In compliance with 28 PA Code §1161.32, Lebanon BioPharma will maintain the following inventory data, among other information, in our internal electronic tracking system:

1) Medical marijuana grown
2) Medical marijuana products produced
3) Medical marijuana transported to approved laboratories or dispensaries
4) Damaged, defective, expired, or contaminated medical marijuana awaiting destruction and disposal

All entries into the BioTrack THC 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 BioTrack THC software system to ensure the accuracy and integrity of our electronic recordkeeping system.
Records and Record Retention

Lebanon BioPharma will adopt best security practices developed and implemented by our medical marijuana industry affiliates in regards to records storage, including but not limited to surveillance footage, security records, growth records, processing records, sales records, inventory records, and other business records. All physical records, except for surveillance footage, will be securely stored in a manager’s office or dedicated records storage room (which will be access-controlled) within a commercial grade storage cabinet, locking closet, or other secure place to protect them from tampering or theft.

Only authorized and properly credentialed agents may access the records. All electronic records will be stored in BioTrack THC (or a similar electronic recordkeeping system) in a manner that is password protected, TLS/SSL encrypted, and accessible only to those authorized persons with proper credentials. Notably, all confidential patient records will be maintained in a HIPAA compliant manner protecting the personal and sensitive information of our patients/caregivers.

Lebanon BioPharma will have an electronic back-up system for all written and electronic records, including surveillance recordings. Duplicate records, including surveillance recordings, will be stored within an access-controlled facility maintained or recommended by our trusted commercial security monitoring service provider, if approved by the Department. Lebanon BioPharma will require our off-site record storage location to be protected by 2 independent security alarm systems monitored by 2 independent commercial security monitoring services, if requested by the Department.
Human Resources Records
Lebanon BioPharma’s Human Resources Department will retain records of job applicants and employees, including but not limited to job applications, signed registration forms, signed employment agreements, State and Federal criminal background reports, annual reviews, initial and refresher training certificates of completion, etc., in accordance with our Human Resources policies. Human Resources will also retain electronic and hardcopy versions of all training materials and attendance records for at least 4 years. All employee files and other relevant records will be made available for inspection by the Department upon request.

Diversity Plan Records
Lebanon BioPharma 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, Lebanon BioPharma 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, Lebanon BioPharma 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

Lebanon BioPharma 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.
Visitor Records
Generally, only authorized employees and the Department or its authorized agents, or other Federal, State, or local government officials performing their official functions and duties may enter our facility. When admitting a visitor, Lebanon BioPharma will require the visitor to sign a visitor log upon entering and leaving a limited access area. Lebanon BioPharma will maintain the visitor log in digital and hard copy for 4 years and make the log available to the Department, State or local law enforcement and other State or local government officials upon request if necessary to perform the government officials’ functions and duties. The log will include:

1) Full name of each visitor
2) Visitor identification badge number
3) Time of arrival
4) Time of departure
5) Purpose of the visit
6) Name and employee identification number of the assigned escort
7) List of all areas visited
8) Name of each employee visited

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

Inventory Audit Records
Lebanon BioPharma will establish inventory controls and procedures to conduct routine scheduled as well as unannounced daily, monthly, and annual inventories and inventory reviews/audits to confirm that our physical inventory matches our digital records stored in BioTrack THC. Monthly inventory reviews include but will not be limited to medical marijuana plants in the process of growing and medical marijuana and medical marijuana products that are being stored for future sale. At least annually, comprehensive inventories of seeds, immature medical marijuana plants, medical marijuana plants, medical marijuana and medical marijuana products will be conducted.

A written record and/or electronic record will be created and maintained for each inventory and audit that will include the date of the inventory, a summary of the inventory findings, and the names, signatures, employee identification numbers and titles or positions of the individuals who conducted the inventory. All audit reports will be recorded digitally and in hard copy. All electronic records will be securely stored onsite for a minimum of 4 years and backed up for secure offsite storage.

Recalls and Returns Records
Lebanon BioPharma will notify the Department and any dispensaries that purchased our medical marijuana immediately upon becoming aware of any problem identified with any of our medical marijuana products and/or any complaint made to a dispensary by a patient, caregiver or practitioner who reports an adverse event from using medical marijuana dispensed by Lebanon BioPharma. We will cease producing and delivering the affected medical
marijuana and coordinate the return of the recalled medical marijuana with the dispensary(ies). All information related to the recall, including all steps taken to transfer products, will be recorded in BioTrack THC, including:

1) A copy of the complaint
2) The name, address, permit number of the dispensary that received the complaint(s) regarding the affected product
3) The name, address, permit number any other dispensary that has purchased the affected product
4) The name, product type, quantity, and unique product identification numbers of all recalled products
5) Nature of the recall or complaint
6) The date and time of any returned products
7) The date and time of the product transfer to the quarantine room
8) The name and identification number of all employees participating in any recall or product transfer activity
9) If applicable, the date and time of product pickup from the dispensary, in the case of recall, for purposes of destruction and disposal, including the employee identification numbers of all staff participating in each step of the pickup/transportation activities
10) If applicable, the date and time of product destruction and/or disposal, including the method of destruction/disposal and the employee identification numbers of all staff participating in each step of the destruction/disposal activities

Upon identifying any returned, unfit (including but not limited to expired, damaged, deteriorated, mislabeled, or contaminated plants or products), and/or recalled medical marijuana, management will immediately update the Department’s electronic tracking system. If applicable, Lebanon BioPharma will have all recalled, returned, or otherwise unfit medical marijuana transported back to its own facility. All medical marijuana handled in these circumstances must be continuously tracked using BioTrack THC.

Business Records
In accordance with 28 PA Code §1161.29 as well as industry best practice, Lebanon BioPharma will create and maintain the following business records:

1) Employment policies and procedures
2) Facility rules, guidelines, and policies
3) Training materials
4) Employment handbooks, manuals, and other documents
6) Policies and procedures for cultivating, processing, testing, packaging, labeling, handling, tracking, transporting, storing, disposing, returning, and recalling products containing medical marijuana in accordance with all applicable laws, rules, and regulations
7) Workplace safety policies and procedures
8) Maintenance, cleaning, and sanitation policies and procedures for the site, facility, tools, and equipment
9) Inventory maintenance and reporting procedures
10) Policies and procedures to investigate complaints and potential adverse events from other medical marijuana organizations, patients, caregivers, or practitioners
11) The use and functionality of the electronic tracking system prescribed by the Department
12) Other plans of operation
13) Annual budgets, financial forecasts, and other business planning reports
14) Transaction and sales records
15) Expenses and expenditures records
16) Inventory audit records, both internally and independently produced
17) List of all current management and employees, including a separate list of all employees permitted to access any security and surveillance areas
18) List of all company vendors, contractors, consultants, and permitted grower/processor manufacturers
19) All notices and written communications with the Department
20) Other business records used in the operation of our facility

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

Equipment Maintenance Log
Lebanon BioPharma 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 4 years and will make the records available to the Department and its authorized agents within 2 business days following a request.

Pursuant to SOPs, Lebanon BioPharma 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.

Inventory Records
Generally, our internal inventory management processes will track and record all actions related to receiving raw materials/crop inputs, cultivation, processing, packaging, labeling,
handling, transferring, receiving, transporting, storing, stocking, disposing, recalling and receiving recalls and returns of medical marijuana products in accordance with all applicable laws, rules, and regulations. In compliance with 28 PA Code §1151.30, Lebanon BioPharma will maintain the following inventory data in our internal electronic tracking system which must include, at a minimum, an accounting of and an identifying tracking number for:

1) The number, weight and type of seeds
2) The number of immature medical marijuana plants
3) The number of mature medical marijuana plants
4) The weight and type of each harvest and process batch
5) The number/weight of medical marijuana pending testing by an approved laboratory
6) The number of medical marijuana products ready for sale
7) The number of damaged, defective, expired or contaminated seeds, immature medical marijuana plants, medical marijuana plants and medical marijuana products awaiting disposal

All entries into the BioTrack THC 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.

**Transaction Records**

Upon each successful delivery and completion of the sale to a permitted dispensary (and upon each delivery of product for testing by an approved laboratory), the transport agent responsible for the delivery will issue a transaction receipt. The agent will access and update the Department’s electronic tracking system with information regarding the transaction including:

1) The name, address, and permit number assigned to Lebanon BioPharma
2) The name, address, and permit number assigned to the dispensary making the purchase (or laboratory receiving the product)
3) The date and time of delivery
4) The quantity, type, and form of medical marijuana delivered
5) Data documented in the transport manifest
6) Any other required data by the Department

Thereafter, the agent will record identical information in BioTrack THC for historical recordkeeping purposes. Additional information recorded in our recordkeeping system includes:

1) A copy of the transport manifest
2) Confirmation that each physical audit of delivered products matches the transport manifest
3) Any discrepancies between the physical audit and the transport manifest, including all remediation actions and investigations taken
4) The results of each packaging/labeling quality assurance inspection conducted during the shipment preparation, transportation and delivery processes
5) Each medical marijuana product accepted by the transport recipient, including all identifying information
6) The date and time of commencement of the delivery procedures
7) The date and time the dispensary/laboratory took custody of the products
8) A copy of the delivery transaction receipt

All information recorded by our staff in BioTrack THC the Department’s electronic tracking system must match.
Other Records, Logs, and Reports
Lebanon BioPharma will maintain many other records, logs, and reports which are not identified above, including but not limited to:

1) Employee access logs, including the dates, times, and identities of those who entered/exited the grower/processor facility itself and those who entered each restricted-access area within the facility
2) Facility and equipment maintenance, sanitation, and cleaning logs
3) Quarantine transfer logs and inspection reports
4) Product destruction and disposal records, including date, time, and method of
6) Loss of power reports
7) Reports of emergency events (e.g., fire, flood, other natural disasters)
Environmental Controls and Related Data
Environmental variables (e.g., temperature, humidity, light cycle, CO2, ventilation) in each room containing medical marijuana tissue material, including the vault room and all grow rooms, will be controlled by a dedicated iPonic 624 series commercial grade environmental controller (or similar system). This critical tool is a system to monitor, record and regulate temperature, humidity, ventilation, lighting and water supply, which will be adjusted to meet plants needs in the different phases of the plant life cycle. 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.

The iPonic system is equipped to monitor, record and regulate all atmospheric conditions of the room, including each room used for the growth of medical marijuana plants. We will keep digital records of fluctuations in the controlled environments to assess the optimal conditions for each varietal cultivated by our organization. Cultivation management will review these records on a regular basis to ensure the health, integrity and rigorous growth of our plants.

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

SECTION 23 – ORGANIZATIONAL STRUCTURE

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<tr>
<td>PA Workers’ Compensation Policy Number (if applicant is currently doing business in Pennsylvania):</td>
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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:

Lebanon BioPharma is a women-owned, family-oriented business interested in bringing greater health and wellness to the City and County of Lebanon, Pennsylvania. A large percentage of our leadership has been personally compelled to enter or support the medical marijuana industry as a result of their own battles with cancer, while others were inspired by a firsthand view of children suffering from illnesses. Our leadership and ownership are overwhelmingly Pennsylvania natives raising families and running businesses here in Pennsylvania – including many who make their homes right here in Lebanon. All have histories of community engagement and charitable support. Many are employers themselves. Together this team brings the experience needed to own and operate a medical marijuana grower/processor facility in the Commonwealth.

Business Best Practices
Recognizing the complexity of medical marijuana, we have chosen to partner with successful operators in states with existing legal medical marijuana programs. These partners own and operate grower/processor facilities and dispensaries in other states that have some of the most restrictive laws with respect to medical marijuana operations and oversight. These affiliates include Nevada Natural Treatment Solutions, Zen Leaf Dispensary in Nevada, Maryland Natural Treatment Solutions, along with Progressive Treatment Solutions, Ataraxia and Clinic Effingham, all in Illinois. We sought operator affiliates that are able to meet the most restrictive regulations to ensure the highest level of standards for our operations.

Also key to the selection of these affiliates, these grower/processor businesses were first to market with their products in their states, they continue to achieve sales growth every month within their markets, they operate expanded research and development laboratories to ensure quality and they deploy the newest sustainable energy technology available for medical advancement. As recognized by their state regulators, they operate the most secure facilities in accordance with state standards and have had no infractions in the history of their operations.

On the dispensary side, these companies have designed inviting and secure facilities to ensure patients are in a comfortable environment given that many who visit the dispensary will be suffering from debilitating diseases. They have also developed and deployed extensive patient outreach and education programs that have already educated thousands of people on treatments, benefits and safe and legal delivery methods. Lebanon BioPharma intends to work with Pennsylvania dispensaries that have similar models.
Our experienced team consists of numerous medical professionals and experts in a number of occupations including a CEO, COO, CFO, and CMO. We have respected leaders in manufacturing, marketing, finance, dispensing, pharmaceutical, security, real estate, quality control, retail, quality assurance, media, transportation, and medical marijuana research.

Our team, through our real estate holdings, has assisted in the deterrent of crime in Lebanon by installing exterior surveillance on our buildings and providing video to local law enforcement when required. Our security manager is involved with the security installation, management, and monitoring of numerous locations throughout Pennsylvania. We have team members experienced in advanced fingerprint and retina technology.

We have over 400 years of combined business experience in the Lebanon community. As business owners and managers we are seasoned veterans in all aspects of business. Our group is commonly sought out to offer our expertise in seminars, presentations, CEO forums, educational and strategic planning for a number of City, State and National programs.

Dr. Kibibi Gaughan, M.D., Chief Medical Officer, brings medical expertise. She is a resident of Lebanon and a physician at Wellspan Family Medicine and Medical Director for Wellspan Good Samaritan Hospital Home Health in Lebanon. She earned her M.D. at American University of the Caribbean and successfully completed her Family Medicine residency at UMass Memorial hospital. She holds Medical Licensure/Certification in Family Medicine-Board Certified 12/2008, Pennsylvania License-Full, Unrestricted 8/2010, Florida License-Full, Unrestricted 11/2008, Massachusetts License-Full, Unrestricted 11/2008, 2013, ECFMG Certification 10/2002, Basic Life Support 2009 and Advanced Life Support Obstetrics 2006-2011. Her extensive teaching and academic activities include Practice Improvement Projects and Residency Curriculum as well as presentations in Post-Partum Hemorrhage, Arthritis, Hypertension and Infertility. She has a personal connection to this venture, as her mother suffers from Multiple Sclerosis and deals with muscular pain daily. In addition, she sees patients of all ages who are in pain but are unable to tolerate prescription medication – many of whom would benefit greatly from medical marijuana.

Dr. Glen Mesaros, M.D., Chief Executive Officer, brings expertise in medicine, especially with cancer patients, pathology, nutrition and holistic medicine, and business ownership to the team. He is a practicing otolaryngologist/head and neck surgeon in the Lebanon community. Dr. Mesaros is involved with treatment and care of patients with advanced cancer of the head and neck. He graduated from Harvard University with Honors in 1986 and then
completed his medical training at the University of Pittsburgh Medical School in 1992. While at medical school, he obtained a master’s degree in Pathology for his research in molecular biology. Dr. Mesaros entered the military for his specialty training and spent six years at Fort Lewis, Tacoma Washington. He stayed on as a staff otolaryngologist at Madigan Army Medical Center and was later transferred to West Point Military Academy as Chief Otolaryngology at Keller Army Medical Center. Dr. Mesaros left the military to come to Lebanon to raise his family. He is co-owner of Flex Health and Wellness in Cleona, Pennsylvania, providing holistic nutritional services.

George Archos, Chief Operating Officer, brings expertise in restaurant ownership, logistics, the medical marijuana industry, real estate development and human resources. George is CEO of Ataraxia Grow and Labs located in Illinois and was the first to receive authorization to grow medical marijuana out of 21 recipients of the coveted Illinois medical marijuana licenses. George owns and operates six well-known and highly successful restaurants including Wildberry Pancakes & Café, Westwood Tavern & Tap and the Scout Waterhouse & Kitchen. With an emphasis on quality and customer experience, his establishments have received multiple awards and recognitions. He has over seven years of experience in logistics, moving crude oil and freight throughout the US and Canada. With sales in excess of $200 million per year and multiple locations throughout the U.S., he has the knowledge and capability to build, establish and efficiently run companies in a variety of areas and states. In addition to these companies, George has a background in real estate development, working with various municipalities in gaining government approvals and construction of multiple projects.

Brian Amerman, Chief Financial Officer, is a long-time resident of and business owner in Lebanon. He brings expertise in financial management, accounting, business management, human resources, and the perspective of a cancer survivor. After graduating from Penn State University, he worked for what is now called Ernst and Young in Baltimore. After five years, in 1988 he and his father bought a small accounting practice in Lebanon and he has been self-employed and managing the practice ever since. He has 10 employees and specializes in accounting and tax work for a variety of small businesses. He also helped found and later sell an Internet business that was known as SunLink. Brain was diagnosed with Hodgkin's disease in 1976 and had surgery to remove the tumor in late 1976. He then underwent radiation therapy throughout the winter and into the spring of 1977.

Charles H. Kinloch, Quality Control Manager, brings nearly 20 years of expertise in Statistical Process Control (SPC), quality measures, quality control and quality assurance for complex technical products. Charles began his career at the steel foundry Quaker Alloy and 17 years later advanced to position of President. Quaker Alloy had a reputation of producing high quality castings in carbon steel and stainless steel for the nuclear, railroad, chemical and power-generation industries. Charles was initially hired as an Ultrasonics Technician and progressed through other quality control departments inclusive of Radiography, Non Destructive Examination - Magnaflux, Liquid Penetrant, Brinnell, Charpy and dimensional verification. He advanced to the quality assurance department with statistical management of various operations and responsibility for a spectrometer that measured chemical analysis and mechanical requirements. He headed the manufacturing operation
inclusion of melting, pouring, cleaning, welding and cleaning prior to his promotion to President. He holds the prestigious ISO 9002 Lloyds Register Quality Certification.

**Robert A. Logan**, Security Manager, brings expertise in *security, security management, and diversion prevention*. His early career began in the United States Marine Corps, where he spent four years. He then joined the Pennsylvania State Police, where he remained for 26 years. During these 26 years, he worked as a Patrol Unit Member for five years and then a Patrol Unit Supervisor for five years. Next he had the opportunity to serve as the Staff Services Unit Supervisor for 12 years. During his tenure as the Staff Services Unity Supervisor, he served as the Evidence Room Custodial, where he supervised every aspect of the retention and security of evidence. He supervised the community services officers and public information officers, who were responsible for conducting security site surveys to schools and other public buildings. For the remaining four years, he served as the Criminal Investigation Unit Supervisor, where he was responsible for supervising every criminal investigation occurring within a multi-county geographical location.

**Laura L. DeMaio, O.D.,** General Manager, is a practicing optometrist trained at the Pennsylvania College of Optometry and 20-year resident of Lebanon. She brings *business ownership* experience as a co-owner of her practice, Bouquet Mulligan DeMaio Eye Professionals, which has revenues of $6 million annually and multiple locations. She works with glaucoma patients and has a nephew with autism, all who may benefit from legal medical marijuana.

**Lois Jean Mease R.N.,** Director of Patient Outreach, brings years of *experience working with U.S. military veterans under medical care*. She is the Registered Nurse Primary Care Manager at the Lebanon Veteran Administration Medical Center since 1991. She became a Registered Nurse in 1968 at the Harrisburg Hospital School of Nursing and holds accreditation through ANCC in Psychiatry and Mental Health.

**Nancy Mesaros**, Patient Outreach Officer, brings expertise in *science, biology, holistic medicine, and patient needs*. She graduated from SUNY Cobleskill in 1983 with a degree in Biology and joined The New York State Institute for Basic Research in 1984 as an Electron Microscopist and Cellular Immunologist. After seven years, she left to become a Pharmaceutical Researcher with Bristol-Myers Squibb and remained there for six years. She is proprietor of Flex Health and Wellness, a successful Holistic Nutrition Consulting Business in Cleona, Pennsylvania. Nancy meets with clients, gives health seminars in the community, operates a supplement and health food store and is a monthly contributor to a local health information magazine. She helps those with chronic disease via holistic and alternative methods.

**Maryann E. Keith**, Director of Community Relations, brings decades of *high-level community service experience and a deep network of relationships with community groups in Lebanon, Pennsylvania*. She has been volunteering for charitable causes for decades. She enthusiastically embraces school, athletic, church, civic, social and community organizations, serving as board member, officer and oftentimes the fundraising chair. She has formed nonprofits such as Jack & Jill Preschool/Kindergarten, raised funds for multiple charities and
led nonprofits and teams of volunteers. She and her family for years has supported the American Cancer Society's Relay for Life, and their team, Dog's Dawgs, was one of the top fundraising teams in the state of Pennsylvania for ten years. She supports American Foundation for Children with AIDS and in 2012 climbed Mt. Kilimanjaro in Tanzania, Africa, as part of a fundraiser called “Climb Up So Kids Can Grow Up.” Most recently she has been supporting Girls on the Run, a physical activity-based, positive youth development program for girls in third through eighth grade that enhances girls’ social, psychological, and physical competencies. Other charities she has supported over the years include the National Multiple Sclerosis Society Leadership Class and the Newcomer's Club.

**Marla Dorf**, Director of Medical Marijuana Research, founded the Hearts for Research Foundation and successfully raises funds for cancer research, a cause she took on as a breast cancer survivor. She is an avid supporter of the Y-Me organization and organizes large groups for cancer walks and charity pizza sales. In 2014 she was introduced to the Compassionate Care Act, a statute that allowed the use of medical marijuana in the State of Illinois. Her own secondary research in the uses of medical marijuana in the treatments of cancer resulted in her and her family’s support of medical marijuana. She holds a bachelor’s degree in education and tutors children.

**Dr. Amy Margaret Westcott, M.D. CMD FAAHPM**, Medical Advisory Board, is nationally recognized for both her clinical expertise in post-acute geriatric palliative care as well as her educational skills. She is certified in the Stanford Clinical Teaching Framework, has completed the Harvard Palliative Care Education and Practice (PCEP) Program, an AMDA - The Society for Post-Acute and Long-Term Care Certified Medical Director (CMD), a Fellow in the American Academy of Hospice and Palliative Medicine (FAAHPM), and is a two-time recipient of the Geriatric Academic Career Award (GACA) from Health Resources and Services Administration (HRSA). She currently serves as the Teachers Section Chair for the national American Geriatrics Society and is on the board for the regional Pennsylvania Hospice and Palliative Care Network.

**Dr. Anne Hayes, M.D.**, Medical Advisory Board, brings expertise in geriatric medicine. She has been a Lebanon resident for 21 years where she practices medicine. In her medical practice in Internal Medicine in Lebanon, she cares for adults of all ages, but primarily focuses on geriatrics. She sees patients at four local nursing homes and, since the beginning of 2016, has been the Medical Director at the Hyman Caplan Pavilion which is a Transitional Care Unit affiliated with Wellspan Hospital. She is a volunteer at the Lebanon Free Clinic and, since 2011, its volunteer Medical Director. These outside practice locations have given her an opportunity to treat patients from all walks of life and in all levels of care.

**Kristin Vukovich**, Medical Advisory Board, works and lives in Lebanon. She brings expertise in pharmaceutical use, dispensing, supervision and management of controlled substances. She has been a staff pharmacist at Wellspan Good Samaritan Hospital since 1999. As a pharmacist, she is responsible for reviewing physician orders to ensure accuracy, inpatient profile management, management of controlled substances, supervisions of pharmacy technicians, drug regimen review and patient counseling, among other responsibilities.
**Maria Dickie**, Medical Advisory Board, brings expertise in **pharmacy**. She has been a licensed pharmacist for 25 years. She fills prescriptions and provides patient education on medications. Many people she sees suffer from chronic pain, mental and physical anomalies and often terminal illnesses and is interested in the benefits of legal medical marijuana.

**Julie Nagle**, Financial Backer, has an extensive background in **business organizational design and layout, Human Resources and professional management within the medical marijuana industry**. She is currently the Human Resource Manager/Co-Owner of Progressive Treatment Solutions (PTS) located in Illinois. This was the third cultivation center to receive authorization to grow medical marijuana out of 21 recipients of the coveted medical marijuana licenses. She is proud of the fact that PTS is the only WBE certified cultivation center in the State of Illinois. She has built her career and businesses around the notion of treating her employees with dignity while paying a living wage. She also owns operations in Nevada and Maryland. Her passion to assist people has driven her interest in the newly evolving medical marijuana industry.

**Business Plan**

Lebanon BioPharma will develop and implement standard operating procedures (SOPs) which will be adopted, and modified accordingly, from our medical marijuana industry affiliates in Illinois, Nevada and Maryland and comply with relevant laws and regulations for all areas of our operations including:

- 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

Our team members own a number of residential and commercial rental properties in Lebanon County. With our extensive knowledge of Lebanon and surrounding communities, we were able to select from a number of locations and settle on a property that best suit the security, production and transportation needs of a grower/processor facility.
Hiring Plan
Our hiring and training plan will be based on the best practices developed by our affiliates already operating in other states. Our plan is to initially bring managers from other states to assist with hiring and training. Thereafter, we will employ 100% local staff. All jobs will be living wage with benefits including health care and retirement. We may also offer comp time for community service. Staff will be trained and educated under proven methods and will follow established work plans. Immediate needs call for 25 staff within the first six months of operations with anticipated expansion thereafter.

Employment Practices
As a women-owned business, diversity and inclusion are critically important to Lebanon Biopharma. The company views diversity and inclusion as core business strategies which will contribute to our overall success. When a company’s workforce reflects the community it serves, the company is better able to understand and meets the needs of its customers and the community at-large.

Community Engagement
Our passion for the City of Lebanon is paramount. Our team is aligned with Lebanon Mayor Capello and local community leaders to improve the City. All of our businesses are in Lebanon County with many situated in downtown Lebanon. We have donated office space for the newly appointed Lebanon Downtown Improvement association and we assist on numerous local committees. Our team is involved in real estate recommendations for businesses, improved lighting, security improvements, the initiation of a dog park and cleanup projects in downtown.

Lebanon BioPharma has reached out and gained the support of community leaders for our proposed grower/processor facility. Pennsylvania Representative Russ Diamond, 102nd Legislative District, has met with Lebanon BioPharma and offers his support of our permit application, as indicated in the attached letter of support. He expresses particular interest in our job creation and economic development potential as a new industry in the community.

District Attorney of Lebanon County David J. Arnold endorses the Lebanon BioPharma application for a grower/processor permit. After several meetings with Lebanon BioPharma, and knowing several of our Principals for a number of years, he believes our team is professional and ethical and “exactly the kind of operators Lebanon County wants and needs,” as written in the enclosed letter of support. He believes Lebanon BioPharma is prepared to address any concerns about security, safety, diversion prevention and maintenance and should be granted a permit.

Lebanon City Mayor Sherry L. Capello has also provided a letter of support for Lebanon BioPharma’s grower/processor application. Lebanon County Commissioners Robert J. Phillips (Chairman) and William E. Ames (Vice Chairman) enthusiastically endorse Lebanon BioPharma in our application for a permit (letter attached).

Within the medical community several experts and practitioners offer support. Dr. James D. Nelson, Jr., of Northwest Medical & Rehabilitation Center, a physician who specializes in neurology, internal medicine and sleep medicine expresses his support of Lebanon BioPharma’s grower/processor permit application in the attached letter. As a doctor whose patients suffer from migraine, epilepsy, MS, sleep disorders, chronic pain, cancer and HIV with a wasting syndrome, he is looking forward to the benefits of legal medical marijuana for his qualifying patients. Lebanon Internal Medicine Associates, a large multi-specialty internal medicine group in Lebanon that provides care to over 20,000 adult and geriatric patients in Lebanon, Lancaster and Dauphin counties, offers its support of this permit application in the enclosed letter presented by its Vice President Anne B. Hayes, M.D. Just Like Family Home Health Care Services is also in full support of Lebanon BioPharma’s grower/processor permit application, as evidenced by the enclosed letter of support from its owner, Tiffany Miller. Local Registered Nurse and Nurse Practitioner Justin Molignoni, along with Dr. Barbara Klatchko, also offer their support of this application in their attached letters.

Notably, even an epilepsy patient and advocate for legalization of medical marijuana Beth McCormack has presented a letter in support of this permit application. A Pennsylvania resident, she believes that Lebanon BioPharma is well suited to operate a grower/processor facility.
A long-time member of the Lebanon business community, Robert Johnson, President of Johnson Motors and Johnson Subaru, believes the proposed Lebanon BioPharma facility will be a boon to the local economy, and he has provided an enclosed letter of support.

With this support from government officials, the medical community, patients and others, Lebanon BioPharma is well positioned to launch and maintain a safe, efficient and financially sustainable grower-processor facility.

**Patient and Practitioner Outreach**

Our goal is to educate the community on the importance of medical marijuana and its safe use. Our education efforts will focus on the many benefits of medical marijuana while dispelling some of the common myths associated with this product. We plan to have many town hall style educational meetings where people can ask questions and spur discussions. We believe it is important for the community to both learn and express their opinions on this topic.

We have a number of health care professionals on the Lebanon BioPharma team with expertise in health education. The following discussions will take place at Flex Health and Wellness in Cleona, PA. We will have several different dates for each discussion so that the community is ensured access to participate. A preliminary program list follows.

**Medical Marijuana Overview**

Presented by Glen Mesaros, M.D. and Nancy Mesaros, B.S., Holistic Nutrition

Topics:
- The history of marijuana and controversy surrounding it
- The marijuana plant
- Cannabidiol and marijuana
- Marijuana as a medication
- Therapeutic effects of medical marijuana
- Administration of medical marijuana
- Who can benefit from medical marijuana

**Medical Marijuana: A Holistic Application for Health**

Presented by Nancy Mesaros, B.S., Holistic Nutrition

Topics:
- Natural therapies involving Cannabidiol
- Natural therapies involving Tetrahydrocannabinol
- A review of the research on medical marijuana for chronic disease and chronic pain
- Using medical marijuana in lieu of pharmaceuticals when pharmaceuticals are not tolerated
- Medical marijuana for brain related disease and injury
- When is medical marijuana right for you
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- How does marijuana fit into a holistic lifestyle

Medical Marijuana for Practitioners  
Presented by Glen Mesaros, M.D., Kibibi Gaughan, M.D. and Raymond DeMaio, M.D.

Topics:
- Medical marijuana overview for practitioners
- Indicated medical conditions
- Review of medical literature
- Process for becoming a prescriber
- State and Federal Law and your practice

Medical Marijuana for Conditions Afflicting Military Veterans  
Presented by Glen Mesaros, M.D. and Lois Mease, R.N.

Topics:
- Review of medical marijuana
- Veteran health issues and medical marijuana solutions
- Administration of medical marijuana as a medication
- Government regulations

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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<td><strong>First Name:</strong> Brian</td>
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Pennsylvania Department of Health
Medical Marijuana Grower/Processor Permit Application

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

**SECTION 26 – OWNERSHIP**

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

(1) For a publicly traded company, voting rights that entitle a person to elect or appoint one or more of the members of the board of directors or other governing board, or the ownership or beneficial holding of 5% or more of the securities of the publicly traded company.
(2) For a privately held entity, the ownership of any security in the entity.

Complete the appropriate section(s) below:

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

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Medical Marijuana Grower/Processor Permit Application

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Pennsylvania Department of Health
Medical Marijuana Grower/Processor Permit Application

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

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

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

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

SECTION 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:

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:

Lebanon BioPharma is a women-owned, family oriented business interested in bringing greater health and wellness to the City and County of Lebanon, Pennsylvania. A large percentage of our leadership has been personally compelled to enter or support the medical marijuana industry as a result of their own battles with cancer including breast cancer and Hodgkin’s Disease. Others were inspired by a firsthand view of children suffering from illnesses. Our leadership and ownership are overwhelmingly Pennsylvania natives raising families and running small businesses here in Pennsylvania – including the majority of whom make their homes right here in Lebanon. All have histories of community engagement and charitable support. Many are employers themselves, including some who make a point of ensuring their own employees are local residents and representative of diverse groups.

Historical Community Impact

The Lebanon BioPharma team has a long history of community service in Pennsylvania and elsewhere. Some examples follow.

- **Maryann E. Keith**, Director of Community Relations, has been volunteering for charitable causes for decades. She enthusiastically embraces school, athletic, church, civic, social and community organizations, serving as board member, officer and oftentimes the fundraising chair. She has formed nonprofits such as Jack & Jill Preschool/Kindergarten, raised funds for multiple charities and led nonprofits and teams of volunteers. She and her family for years has supported the American Cancer Society's Relay for Life, and their team, Dog's Dawgs, was one of the top fundraising teams in the state of Pennsylvania for ten years. She supports American Foundation for Children with AIDS and in 2012 climbed Mt. Kilimanjaro in Tanzania, Africa, as part of a fundraiser called “Climb Up So Kids Can Grow Up.” Most recently she has been supporting Girls on the Run, a physical activity-based, positive youth development program for girls in third through eighth grade that enhances girls’ social, psychological, and physical competencies. Other charities she has supported over the years include the National Multiple Sclerosis Society Leadership Class and the Newcomer's Club.

- **Nancy Mesaros**, Patient Outreach Officer, has always been interested in health and wellness. Over the years she developed an interest in a natural approach to health care became a Holistic Nutrition Consultant. Through her Flex Health and Wellness Holistic Nutrition Consulting Business, she educates the community on natural health and wellness issues. She holds well attended seminars and health programs and travels around the community giving presentations on myriad health and wellness subjects. During the last six years she has presented at Alley Center for The Blind, South Lebanon Elementary School, The Lebanon Rotary Club, Lebanon Family Health Services, Lebanon Healthy Moms and Tots, Lebanon Amateur Herbalists, University of West Chester Earth Club and the local Women’s Bible Group. She also supports, along with her husband, the Pennsylvania Wounded Warrior Project and has been instrumental
in organizing and participating in the numerous yearly fundraisers for Swing for the Troops. These events raise money for wounded veterans and other veterans in need in Pennsylvania and bring awareness to this important organization and the work that they do.

- **Brian Amerman**, Chief Financial Officer, is a long-time resident of and business owner in Lebanon. He is a supporter of the American Cancer Society. As a cancer survivor, he is in a unique position to provide inspiration to those suffering from cancer and the volunteers helping them through it. He also participated in its annual Relay for Life. He supports the E&E Foundation which runs a golf tournament each spring to benefit a different community organization, Mike Swisher Scholarship Fund, and Swing for the Troops which holds a golf tournament and dinner annually to raise funds to help Pennsylvania's wounded warriors. His accounting firm has prepared, pro bono, their IRS applications for nonprofit status and their annual tax filings.

- **Marla Dorf**, Medical Marijuana Research Contributor, founded the Hearts for Research Foundation and successfully raises funds for cancer research, a cause she took on as a breast cancer survivor. She is an avid supporter of the Y-Me organization and organizes large groups for cancer walks and charity pizza sales. In 2014 she was introduced to the Compassionate Care Act, a statute that allowed the use of medical marijuana in the State of Illinois. Her own secondary research in the uses of medical marijuana in the treatments of cancer resulted in her and her family’s support of medical marijuana.

- **Laura L. DeMaio, O.D.**, General Manager, is a practicing optometrist and 20-year resident of Lebanon. Her practice, Bouquet Mulligan DeMaio Eye Professionals, donates to many charitable causes. She provides free vision screenings at community events and participates in the Volunteers in Medicine program to serve the underprivileged. She has volunteered with local schools to assist in free vision screening programs and spoken about vision and eye care within classrooms. She has been a member of St. Luke’s Episcopal Church since 1996, served as a volunteer for many of its community projects and held a position on the Vestry from 2002-2006. She is a blood donor for the American Red Cross and a registered organ donor. As a breast cancer survivor, she educates and promotes early detection by educating patients and attending walks, rallies, golf tournaments and various fundraising events. She supports the Children’s Miracle Network and the Wounded Warrior Project. She served on the board of a local swim team for several years, volunteering countless hours to the community pool to promote the sport of swimming. She has a small private farm where one of her horses is used to provide therapy services under her direction to a local child with Autism. She takes her dogs to visit seniors at two local nursing homes.

- **Kristin Vukovich**, Medical Advisory Board, works and lives in Lebanon. She has a long history of community service in her local community. She has coached Lebanon youth in the Rising Star Youth Soccer and Falcon Youth Basketball programs and provided volunteer services at Cornwall Elementary School. She is a key member of the Cedar Crest Field Hockey Parents Club. She is a Pharmacist Counselor for the non-profit
Institute for Safe Medication Practices’ “Brown Bag” medication programs to counsel and teach community residents about safe medication compliance.

- **Dr. Amy Margaret Westcott, M.D. CMD FAAHPM**, Medical Advisory Board, serves currently or previously on multiple medical and medical education boards and committees, including American Medical Directors Association, Eastern Pennsylvania Geriatric Society, American Academy of Hospice and Palliative Medicine, Supportive Older Women's Network and John A. Hartford Foundation. She currently serves as the Teachers Section Chair for the national American Geriatrics Society and is on the board for the regional Pennsylvania Hospice and Palliative Care Network.

- **Dr. Glen Mesaros, M.D.**, Chief Executive Officer, is a practicing otolaryngologist/head and neck surgeon in the Lebanon community where he is raising a family. He is involved in several community service activities. He has supported the Volunteers in Medicine by providing medical services to those in need. He is a musician and plays for charitable events to help in fundraising. He supports the military and formed his own charity called Swing for the Troops, which raises funding for Pennsylvania veterans in need. Dr. Mesaros also has volunteered as a baseball and basketball coach for local youth.

- **Charles H. Kinloch**, Quality Control Manager, provides marketing materials pro bono through his company, Fresh Creative, to the City of Lebanon, Volunteers in Medicine, the local Chamber of Commerce, United Way, St. Cecilia benefit event, Good Samaritan Hospital Street Fair Benefit, Domestic Violence, Church of the Good Shepherd, and Aurora Social Rehabilitation. He serves on the NIDMA, a governing board for a non-profit charity. His community engagement also includes City of Lebanon Chairman of the Business Improvement District recruitment committee, Community of Lebanon Association, Lebanon Valley Chamber of Commerce, Volunteers in Medicine, PIAA, Lebanon Valley Tourist Bureau, Lebanon School District, Lebanon Farmers Market, and volunteer basketball referee for youth programs.

- **Dr. Kibibi Gaughan, M.D.**, Chief Medical Officer, is a proud resident of Lebanon and currently a physician at Wellspan Family Medicine and Medical Director for Wellspan Good Samaritan Hospital Home Health in Lebanon. She is on the Personnel Committee at Lebanon Country Club and actively supports Development & Disability Services of Lebanon Valley, the United Way, and Young Survivors Coalition (Breast Cancer). She is a faithful parishioner at St. Paul the Apostle Church in Annville, Pennsylvania.

- **George Archos**, Chief Operating Officer, gives back to his community through charitable donations and volunteer work. He is closely associated with the Boys and Girl Club and has helped them expand their programs over the years and build nutritional menus for their members.

- **Dr. Anne Hayes, M.D.**, Medical Advisory Board, has been a Lebanon resident for 21 years where she practices medicine. She volunteers for the Lebanon Free Clinic and has
been its Medical Director since 2011. She volunteers for “Ask the Doctor” call in program with the Pennsylvania Medical Society and medical days and the science fair for Jack and Jill Kindergarten.

- **Julie Nagle**, Financial Backer, volunteers with local small businesses to formalize their business practices and policies. She finds this work rewarding and enjoys contributing whenever possible. She is an active member of St. Theresa’s Parish in Palatine, were she can be seen volunteering on a regular basis.

The Lebanon BioPharma team is looking forward to applying our philanthropic spirit and volunteer commitments in support of Lebanon City and County, where our facility will operate.

**Community Relations**

Lebanon BioPharma has reached out and gained the support of community leaders for our proposed grower/processor facility. Pennsylvania Representative Russ Diamond, 102nd Legislative District, has met with Lebanon BioPharma and offers his support of our permit application, as indicated in the attached letter of support. He expresses particular interest in our job creation and economic development potential as a new industry in the community.

District Attorney of Lebanon County David J. Arnold endorses the Lebanon BioPharma application for a grower/processor permit. After several meetings with Lebanon BioPharma, and knowing several of our Principals for a number of years, he believes our team is professional and ethical and “exactly the kind of operators Lebanon County wants and needs,” as written in the enclosed letter of support. He believes Lebanon BioPharma is prepared to address any concerns about security, safety, diversion prevention and maintenance and should be granted a permit.

Lebanon City Mayor Sherry L. Capello has also provided a letter of support for Lebanon BioPharma’s grower/processor application. Lebanon County Commissioners Robert J. Phillips (Chairman) and Willian E. Ames (Vice Chairman) enthusiastically endorse Lebanon BioPharma in our application for a permit (letter attached).

Within the medical community several experts and practitioners offer support. Dr. James D. Nelson, Jr., of Northwest Medical & Rehabilitation Center, a physician who specializes in neurology, internal medicine and sleep medicine expresses his support of Lebanon BioPharma’s grower/processor permit application in the attached letter. As a doctor whose patients suffer from migraine, epilepsy, MS, sleep disorders, chronic pain, cancer and HIV with a wasting syndrome, he is looking forward to the benefits of legal medical marijuana for his qualifying patients. Lebanon Internal Medicine Associates, a large multi-specialty internal medicine group in Lebanon that provides care to over 20,000 adult and geriatric patients in Lebanon, Lancaster and Dauphin counties, offers its support of this permit application in the enclosed letter presented by its Vice President Anne B. Hayes, M.D. Just Like Family Home Health Care Services is also in full support of Lebanon BioPharma’s grower/processor permit application, as evidenced by the enclosed letter of support from its owner, Tiffany Miller. Local Registered
Nurse and Nurse Practitioner Justin Molignoni, along with Dr. Barbara Klatchko, also offer their support of this application in their attached letters.

Notably, even an epilepsy patient and advocate for legalization of medical marijuana Beth McCormack has presented a letter in support of this permit application. A Pennsylvania resident, she believes that Lebanon BioPharma is well suited to operate a grower/processor facility.

A long-time member of the Lebanon business community, Robert Johnson, President of Johnson Motors and Johnson Subaru, believes the proposed Lebanon BioPharma facility will be a boon to the local economy, and he has provided an enclosed letter of support.

**Community Commitments**

As a women-owned business, diversity and inclusion are critically important to Lebanon Biopharma. The company views diversity and inclusion as core business strategies which will contribute to our overall success. When a company’s workforce reflects the community it serves, the company is better able to understand and meets the needs of its customers and the community at-large.

Diversity and inclusion are also reflected in the company’s leadership structure. The company will be led by Chief Executive Officer Dr. Glen Mesaros, a veteran who also holds a significant ownership interest in the company of 39%. Of the company’s 11 management-level positions, five will be held by women, including: (1) Chief Medical Officer Dr. Kibibi Gaughan (who is also African American); (2) Director of Patient Outreach Lois Mease; (3) Director of Patient Outreach Nancy Mesaros; (4) Director of Medical Marijuana Research Marla Dorf; and (5) General Manager Laura DeMaio. In addition, the company has established a Medical Advisory Board made up of four female physicians. The members of the Advisory Board will provide support and guidance in the areas of medical marijuana research, and medical knowledge concerning cancer, epilepsy and PTSD. By reflecting diversity at the highest levels of the company, Lebanon Biopharma is actively modeling our Diversity and Inclusion Mission on a day-to-day basis, and setting the tone for our employees, vendors and other points of contact.

Our Equal Employment Opportunity Policy:

Lebanon BioPharma’s policy is to select, place, train and promote the best qualified individuals. The company is committed to complying with local, state and federal laws, and recognizes the following protected classes of individuals: race, color, ethnicity, ancestry, national origin, gender, sex, age, disability, religion, citizenship, sexual orientation, gender identity, veteran status, marital status, labor union membership, genetic disposition and other non-job-related criteria.

Lebanon BioPharma has adopted an official Affirmative Action Plan, pursuant to which the company has established hiring and placement goals based on labor force statistics for Lebanon City and County. The company’s affirmative action plan contains a number of action oriented
objectives which Lebanon BioPharma plans to implement to ensure that we reach our placement goals.

Internal Diversity Goals
Through our formal Diversity Plan, Lebanon BioPharma has established three diversity goals that align with our core areas of focus:

Diversity Goal #1: Recruitment and Hiring. To strive for, achieve and maintain employment participation for protected group members throughout all job categories in proportion to the local labor force. This goal is specifically tied to the benchmarks established in the company’s Affirmative Action Plan, which will guide the company’s recruitment and hiring strategy. The company has identified the following recruitment and hiring strategies which we will implement to achieve those benchmarks:

- Job openings will be distributed to community-based recruitment sources, including workforce development agencies and community organizations. Lebanon BioPharma has already identified several diverse vendors with which we may partner to ensure that our recruitment strategy encompasses the broadest possible applicant pool. Partnerships with these organizations will allow Lebanon BioPharma to focus recruitment efforts on veterans, individuals with disabilities, and other populations experiencing disenfranchisement with respect to the local labor market.

- Lebanon BioPharma will actively recruit diverse candidates from local colleges, universities, community colleges, trade schools and other educational institutes, by distributing job postings and attending job and career fairs.

- The company will utilize employment agencies and recruiters with experience in recruiting diverse candidates. This recruitment strategy also advances the company’s goal of enhancing diverse participation through partner relationships with vendors, by allowing Lebanon BioPharma to explore partnership opportunities with employment agencies that hold a Small Diverse Business certification.

- Lebanon BioPharma will post and maintain employment information on our website explaining the company’s Diversity and Inclusion Mission, and listing available job openings.

- Job descriptions will be carefully developed and implemented to ensure that they do not include restrictive and unnecessary minimum requirements that might restrict the company’s ability to employ diverse and disenfranchised candidates.

- The company will actively seek out diverse media sources in the local and extended community that may include print, radio, television and internet advertising for open job positions.
Our Chief Diversity Officer will assist in recruitment and hiring efforts to ensure that the company’s Diversity and Inclusion Mission is being effectively carried out, and that recruitment efforts are reaching a diverse pool of potential applicants.

**Diversity Goal #2: Professional Development and Retention.** To maintain employment participation for protected group members by retaining diverse employees and ensuring equal opportunity for advancement. Lebanon BioPharma recognizes that bringing on new employees is only one piece of a diversity and inclusion strategy. Once employees become part of the Lebanon BioPharma team, the company is committed to both their professional development and personal growth. Emphasis will be placed on skills development, promoting from within, and equal opportunity for advancement. Lebanon BioPharma will implement the following strategies to enhance the professional development of our employees:

- The company’s equal employment opportunity, anti-discrimination and anti-harassment, and ADA policies will be included in the employee handbook and disseminated to all employees at the time of hire, and the Diversity and Inclusion Mission Statement will be posted throughout company facilities.

- Lebanon BioPharma will provide diversity training to all employees to reinforce our Diversity and Inclusion Mission, foster a welcoming work environment for all employees, and ensure that managers and employees understand their rights and obligations under the company’s equal employment opportunity, anti-discrimination and anti-harassment, and ADA policies.

- The company will provide manager training to management level employees to assist managers in identifying workplace conduct and issues that violate the company’s anti-discrimination and anti-harassment policy, responding to reports of discrimination and harassment, and helping to create a workplace free of discrimination and harassment.

- Lebanon BioPharma will develop an onboarding process to orient new employees which will include special focus on the company’s Diversity and Inclusion Mission and objectives.

- The company will develop a mentoring program to partner new employees with existing employees to assist new employees in becoming acclimated to the company, and provide a point of contact for new employees to ask questions in an open forum. The mentoring program will also include the opportunity for interaction with company leadership.

- The company will develop and implement mobility programs aimed at helping employees to grow and advance within the company, and ensuring that all employees have an equal opportunity for advancement. Mobility programs may include educational opportunities for line level employees who aspire to management positions, skills training for management-level employees and a mentoring program.
**Diversity Goal #3: Partnerships with Vendors.** To ensure that qualified Small Diverse Businesses have equal opportunity to bid and contract for the provision and goods and services to Lebanon BioPharma. The third prong of Lebanon BioPharma’s diversity strategy is to partner with Small Diverse Businesses (SBDs) for its contracting needs. The company will actively seek out partnerships with diverse vendors, suppliers, contractors and service providers to enhance the participation of these groups in the success of its business, and to provide opportunities for diverse businesses to be successful. In an effort to meet this goal, Lebanon BioPharma will abide by the following guidelines with respect to our third-party vendor relationships:

- The company will utilize the Pennsylvania Department of General Services Bureau of Diversity, Inclusion & Small Business Opportunities searchable database to locate Small Diverse Businesses that offer goods and services vital to the company’s business operations.
- When the need for a third-party vendor arises, the company will actively solicit Small Diverse Businesses for business and contracting opportunities.
- The company will develop a database of Small Diverse Businesses to serve its contracting needs.
- The company will include information on our website describing its procurement needs, processes and general contract information, and inviting Small Diverse Businesses to contact the company about contracting opportunities.
- The company will assist diverse vendors and suppliers by providing information and feedback concerning the company’s contracting needs so that they can compete effectively on price, service, and quality.
- The Chief Diversity Officer will work with Department Managers to track and quantify dollar volume and performance of suppliers and vendors to monitor compliance with this Diversity Plan.
- The company will develop a competitive bidding process that maximizes participation by diverse vendors.
- The company will require that all vendors who do business with us have equal employment opportunities in place, and will request this information as part of our competitive bidding process.
- The company will develop a process to integrate a supplier diversity program into our sourcing process.

**Diversity-Oriented Outreach Events**

Lebanon BioPharma has identified a number of recruitment strategies aimed at generating a broad and diverse applicant pool. These outreach efforts will include partnerships with
community organizations which will allow Lebanon BioPharma to focus our recruitment efforts on veterans, service-disabled veterans, individuals with disabilities and other populations experiencing disenfranchisement with respect to the labor market. In particular, we intend to form relationships with the following agencies and organizations that focus on job placement for disenfranchised populations:

- Pennsylvania CareerLink;
- Pennsylvania Office of Vocational Rehabilitation Services;
- Disability Rights Pennsylvania;
- Lebanon County Community Action Partnership;
- Developmental and Disability Services of Lebanon Valley;
- United Way of Lebanon County; and
- AHEDD.

The company’s Diversity Plan also requires the creation of an internal Diversity Focus Group. Among the Focus Group’s core responsibilities are:

- Developing internal programs and events which foster the company’s Diversity Plan.
- Developing external programs and events which positively impact the community; developing, supporting and advertising employee volunteer opportunities and events.

Contracts with Diverse Groups

As set forth in the company’s Diversity Plan, Lebanon BioPharma has outlined various vendor guidelines that we intend to implement in order to increase participation by diverse vendors. If a grower/processor permit is granted, one of Lebanon BioPharma’s first major tasks will be the design and construction of a grower/processor facility. This construction project presents significant opportunities for the company to partner with Small Diverse Businesses that provide design services, construction services, construction management services, and construction goods. The company has established a preliminary budget of $6 million to construct our facility. Of the total construction budget, our goal is to allocate a minimum of 50% to Small Diverse Business contractors.

Lebanon BioPharma has also identified several areas where the opportunity exists for the company to partner with SDBs. These include:

- Procurement of Goods
  - Procurement of agricultural machinery.
  - Procurement of soil, soil sampling apparatus and soil testing resources.
  - Procurement of cultivation supplies – pots, planters, shovels, etc.
  - Procurement of office supplies and computer equipment.
  - Procurement of cleaning and janitorial supplies.
  - Procurement of office furniture.

- Procurement of Services
  - Design, construction and procurement of irrigation systems.
- Design, construction and procurement of greenhouses.
- Design, construction and procurement of greenhouse ventilation.
- Information Technology and network services and support.
- Staffing and recruitment services.
- Snow removal services.
- Payroll processing.
- Janitorial services.

The company has pledged to allocate a minimum of 50% of our procurement budget to Small Diverse Business contractors, and has already begun compiling a database of SDBs, which is included in our Diversity Plan.

As reflected in Lebanon BioPharma’s Diversity Plan, the company has committed to: (1) providing diversity training to all employees; (2) provide manager training to management-level employees to reinforce the company’s Diversity and Inclusion Mission; (3) developing an onboarding process to orient new employees to the company; (4) developing a mentoring program to partner new employees with existing employees and provide interaction with company leadership; and (5) developing mobility programs aimed at helping employees grow and advance within the company, and ensuring equal opportunity for advancement. We believe that ensuring traditionally disenfranchised individuals and businesses have a fair chance at employment and advancement and contracts will be integral to boosting the economic condition of Lebanon City and County.

**Educational Outreach to Patients and Physicians**

*Community Education and Outreach Program*

Our goal is to educate the community on the importance of medical marijuana and its safe use. Our education efforts will focus on the many benefits of medical marijuana while dispelling some of the common myths associated with this product. We plan to have many town hall style educational meetings where people can ask questions and spur discussions. We believe it is important for the community to both learn and express their opinions on this topic.

We have a number of health care professionals on the Lebanon BioPharma team with expertise in health education. The following discussions will take place at Flex Health and Wellness in Cleona, PA. We will have several different dates for each discussion so that the community is ensured access to participate. A preliminary program list follows.

**Medical Marijuana Overview**

Presented by Glen Mesaros, M.D. and Nancy Mesaros, B.S., Holistic Nutrition

**Topics:**
- The history of marijuana and controversy surrounding it
- The marijuana plant
- Cannabidiol and marijuana
- Marijuana as a medication
• Therapeutic effects of medical marijuana
• Administration of medical marijuana
• Who can benefit from medical marijuana

Medical Marijuana: A Holistic Application for Health
Presented by Nancy Mesaros, B.S., Holistic Nutrition

Topics:

• Natural therapies involving Cannabidiol
• Natural therapies involving Tetrahydrocannabinol
• A review of the research on medical marijuana for chronic disease and chronic pain
• Using medical marijuana in lieu of pharmaceuticals when pharmaceuticals are not tolerated
• Medical marijuana for brain related disease and injury
• When is medical marijuana right for you
• How does marijuana fit into a holistic lifestyle

Medical Marijuana for Practitioners
Presented by Glen Mesaros, M.D., Kibibi Gaughan, M.D. and Raymond DeMaio, M.D.

Topics:

• Medical marijuana overview for practitioners
• Indicated medical conditions
• Review of medical literature
• Process for becoming a prescriber
• State and Federal Law and your practice

Medical Marijuana for Conditions Afflicting Military Veterans
Presented by Glen Mesaros, M.D. and Lois Mease, R.N.

Topics:

• Review of medical marijuana
• Veteran health issues and medical marijuana solutions
• Administration of medical marijuana as a medication
• Government regulations
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

<table>
<thead>
<tr>
<th></th>
<th>Yes</th>
<th>No</th>
</tr>
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<tr>
<td>By checking &quot;Yes,&quot; you acknowledge that you have read the Medical Marijuana Organization Permit Application Instructions before completing an application for a medical marijuana organization permit.</td>
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</table>

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

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

**Application:**
- ☒ Completed Application

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

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

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

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<tr>
<th>File Name</th>
<th>Name of Document</th>
<th>Purpose</th>
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<td>Lebanon BioPharma 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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<td>Additional Information</td>
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<td>Current Officers (contd.)</td>
<td>Additional Information</td>
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<td>Lebanon BioPharma LLC_03202017_Grower-Processor_Letters from Community</td>
<td>Letters from Community Leaders</td>
<td>Additional Information</td>
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<td>Leaders</td>
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A false statement made in this application is punishable under the applicable provisions of 18 Pa. C.S. Ch. 49 (relating to falsification and intimidation).

[Signature]
Principal
3/15/17

Title in Applicant's Business

Date

Printed Name

[Signature]
Principal
3/15/17

Title in Applicant's Business

Date

Printed Name

pennsylvania
DEPARTMENT OF HEALTH
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 [Date]

[Printed Name]

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

Instructions:
- Attach certified copies of the applicant's certificate of incorporation, partnership agreement, charter or other such documentation. If the applicant is not organized in Pennsylvania, attach certified copies of documentation that show that the applicant is authorized to do business in Pennsylvania.
- Complete this cover sheet. Scan this sheet and the organizational documents and save it as a PDF file called "Attachment B," using the appropriate file name format.

| Business Name, as it appears on the applicant's certificate of incorporation, charter, bylaws, partnership agreement or other legal business formation documents: | Lebanon BioPharma LLC |
| Trade names and DBA (doing business as) names: | N/A |
| Principal Business Address: | 1594 Cumberland Street #300 |
| City: | Lebanon |
| State: | PA |
| Zip Code: | 17402 |
| Phone: | DOH REDACTED |
| Fax: | N/A |
| Email: | lebanonwbiopharma@gmail.com |
AMERMAN, BRIAN
205 NARROWS DRIVE
LEBANON PA 17046

Lebanon BioPharma LLC

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

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

ENTITY NUMBER: 6481378
Certificate of Organization Domestic Limited Liability Company
(15 Pa.C.S. § 8913)

Name: BRIAN AMERMAN

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

Fee: $125.00

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

1. The name of the limited liability company (designator is required, i.e., “company”, “limited” or “limited liability company” or abbreviation):
   Lebanon BioPharma LLC

2. The (a) address of the limited liability company’s initial registered office in this Commonwealth or (b) name of its commercial registered office provider and the county of venue is:
   (a) Number and Street  City  State  Zip  County
   (b) Name of Commercial Registered Office Provider  County
   c/o:

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

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 term
Management of the company is vested in a manager or managers.

6. The specified effective date, if any is: (month date year hour, if any) 12/01/2016 6:09 PM
   month  date  year  hour, if any

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

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

IN TESTIMONY WHEREOF, the organizer(s) has (have) signed this Certificate of Organization this 30 day of November, 2016.

Brian G Amerman
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.

<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>
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<tbody>
<tr>
<td>Lebanon BioPharma LLC</td>
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<tr>
<td>Trade names and DBA (doing business as) names:</td>
</tr>
<tr>
<td>N/A</td>
</tr>
<tr>
<td>Principal Business Address: 1594 Cumberland Street #300</td>
</tr>
<tr>
<td>City: Lebanon</td>
</tr>
<tr>
<td>Phone: [REDACTED]</td>
</tr>
</tbody>
</table>
AFFIDAVIT OF CONSENT BY PROPERTY OWNER

Pursuant to 35 P.S. §10231.101 et. seq. and 28 Pa. Code §1141.29(b), Lotus Land, LLC, does hereby swear and affirm, subject to penalties of law including 18 Pa. C.S. §4904 relating to unsworn falsification to authorities that:

1. I am the property owner of the real estate located on State Drive, South Lebanon Township, Lebanon County, Pennsylvania, and identified as UPI# 30:2350738-352096-0000, consisting of a portion of the 120 acres.

2. As owner of said property, I have entered into an unexpired lease with applicant, Lebanon BioPharma, LLC, t/d/b/a Lebanon Business Associates with respect to a portion of said real estate in connection with their application for a grower/processor permit under Pennsylvania’s Medical Marijuana Act.

3. As the property owner, I consent to the operation of a medical marijuana organization on the proposed site for, at a minimum, the term of the initial permit, and acknowledge the use for which they are applying for said permit.

Date: 1/3/17

LOTUS LAND, LLC

By:

[Signature]

Print Name

A photocopy of this authorization shall be deemed valid for this purpose.

Sworn to and subscribed
before me this 3RD day of JANUARY, 2017.

Sue A. Rodkey
Notary Public

COMMONWEALTH OF PENNSYLVANIA

NOTARIAL SEAL
Sue A. Rodkey, Notary Public
City of Lebanon, Lebanon County
My Commission Expires December 03, 2017
LEASE AGREEMENT

THIS LEASE AGREEMENT is made and entered into as of this 27th day of February, 2017, by and between LEBANON BIOPHARMA, LLC t/a LEBANON BUSINESS ASSOCIATES, organized and existing under the laws of the Commonwealth of Pennsylvania, having its principal place of business at 815 Cumberland Street, Lebanon, Pa., 17042 (“Tenant”) and George E. Christianson and LOTUS LAND, LLC, a Pa. Limited Liability Company, organized and existing under the laws of Pennsylvania, at 724 E. Cumberland Street, Lebanon, Pennsylvania, 17042 but with a mailing address of 411 Chestnut Street, Lebanon, PA 17042 (“Landlord”).

The parties agree as follows:

1. LEASED PREMISES. Landlord hereby leases to Tenant and Tenant hereby leases from Landlord the land and improvements located on State Drive, in South Lebanon Township, Lebanon County, PA, and identified as # 30:2350738-352066, which consists of approximately 120 acres. Attached as Exhibit A is a portion thereof. (The “Leased Premises”).

2. TERM. The Term of this Lease Agreement shall commence the 1st day of January, 2017, immediately upon execution by the parties and shall continue in full force and effect through the date which is exactly twelve (12) months following the date on which a Permit is awarded and transferred to Tenant by the Department of Health of the Commonwealth of Pennsylvania pursuant to 35 P.S. §10231 et. seq. and the regulations promulgated thereunder (“Permit”). Should Tenant not be awarded a Permit as defined herein, Tenant may immediately terminate all of its obligations under this Lease Agreement upon the delivery to Landlord of written notice of same, with the effective termination date of the Lease Agreement as of the date of said written Notice.

3. OPTION TO PURCHASE. Landlord hereby granted to Tenant the right to purchase the leased Premises after the first ten years of the Lease, at a purchase price which shall be determined by mutual agreement between the parties. (the “Option”). Tenant can exercise the option by delivering notice in writing to Landlord at Landlord’s address appearing hereinabove or at such address as Landlord shall designate from time to time by written notification to Tenant pursuant to Paragraph 23 herein within the initial term of this Lease defined in Paragraph 2 hereinabove.

4. RENT. Tenant shall pay to Landlord at Landlord’s address appearing hereinabove or at such address as Landlord shall designate from time to time by written notification to Tenant, monthly Base Rent for the Leased Premises as hereinafter set forth. Landlord agrees to abate payment of the monthly Base Rent from the date of commencement hereof (hereinafter “Base Rent Abatement”) until the Department of Health of the Commonwealth of Pennsylvania has issued a Permit to Tenant. Notwithstanding the foregoing, in no case shall the abatement of rent extend beyond December 31, 2017, unless mutually agreed otherwise in writing and signed by Landlord and Tenant. Following the earlier of the issuance of the Permit, or on January 1, 2018, Tenant shall pay Base Rent for the remaining Lease Term in the amount of One Thousand Dollars ($1,000.00) per month in advance on the first day of each calendar month. Rent for any
partial month shall be prorated. All other amounts payable by Tenant to Landlord pursuant to the terms of this Lease shall be considered Additional Rent. All rent payments shall be made by check acceptable to Landlord, Cashier's Check or Money Order. No cash payments will be permitted.

5. **MAINTENANCE.** The Leased Premises includes a building and the area surrounding the same, together with ingress and egress. Tenant will maintain the structural soundness and integrity of the Leased Premises, including making any repairs as soon as practicable after discovery by Tenant or notice from Landlord. Tenant shall also be responsible for all glass, interior walls, plumbing, electrical and HVAC systems and other fixtures in or around the structure. Tenant shall maintain the Leased Premises in good condition, including keeping the outdoor areas and landscaping in a clean and orderly condition, free of trash and debris. Tenant shall acquire and pay for annual service contracts, from service providers as required by 35 P.S. §10231.101 et. seq. and the regulations promulgated thereunder. Landlord shall pay for the regular maintenance and repairs on the plumbing, electrical and HVAC systems as well as the ground maintenance and repairs.

6. **USE AND COMPLIANCE OF LAWS.** Landlord and Tenant shall comply with all state, county, municipal and other governmental statutes, laws, rules, orders, ordinances and regulations affecting the Leased Premises. Notwithstanding same, Tenant may exclusively use and occupy the Leased Premises for the cultivation of marijuana, production, storage and distribution of marijuana products in strict accordance with the Pennsylvania law set forth in 35 P.S. §10231.101 et. seq. and the regulations promulgated thereunder. Tenant shall be responsible for maintaining a current understanding of Pennsylvania law and shall upgrade, improve or alter the Premises to comply with current Pennsylvania law relative to 35 P.S. §10231.101 et. seq. and the regulations promulgated thereunder. Landlord and Tenant shall comply with all Federal laws to the extent those laws are not inconsistent with state and local laws allowing the Tenant to use the Leased Premises for the permitted uses identified herein. Such use as described herein by Tenant shall not be considered a violation of Federal law for purposes of said Lease or constitute a default under the terms of the Lease.

7. **TAXES, FINES, ASSESSMENTS AND HOOK UPS.**

   A. Tenant shall pay and discharge all fines, taxes, general and special assessments, and other charges of every description which during this Lease Agreement may be levied on or assessed against the Leased Premises and all interests therein and all improvements and other property thereon. Taxes for a partial year of occupancy by Tenant shall be prorated. All reference to “tax” or “taxes” in Paragraph 7 herein are defined as real estate taxes.

   B. Tenant agrees to and shall protect and hold harmless Landlord and the Leased Premises from charges included due to tenant’s acts or omissions and from any sale or other proceeding to enforce payment thereof.
C. Tenant shall use its best efforts to cause all fines, taxes, assessments, and other charges levied on or imposed on any of its personal property situated in, on, or about the Leased Premises to be levied on or assessed separately from Leased Premises and not as a lien thereon.

D. If Tenant fails to pay such fines, taxes, assessments, or charges, Landlord may, at its option, pay such fines, taxes, assessment, or charges, together with all penalties and interest which may have been added thereto because of Tenant's delinquency or default, and may likewise redeem the Leased Premises, or any part thereof, from any tax sale or sales. Any such amounts so paid by Landlord shall be treated as additional Rent due hereunder.

E. Tenant shall have the privilege, before delinquency occurs, of protesting, contesting, objecting to, or opposing the legality or amount of any such fines, taxes, assessments, license fees, or public charges to be paid by Tenant hereunder. If Tenant shall, in good faith, deem the same to be illegal or excessive, and in the event of any such contest, he may to the extent provided by law defer payment of any such fine, tax assessment, fee, or charge so long as the legality or the amount thereof is so contested in good faith; provided, however, that if at any time payment of the whole or any part thereof shall become necessary in order to prevent the imposition of a lien on the Leased Premises, or to prevent eviction of either Landlord or Tenant because of nonpayment thereof, Tenant shall pay the same in order to prevent such lien or such eviction.

F. If, during the term of this Lease or any renewal thereof, any governing body having jurisdiction over the Leased Premises orders, directs, mandates, recommends, suggests or requires that the Leased Premises be connected, hooked up to or receive any service or utility which is not currently connected or hooked up to the Leased Premises, Tenant shall promptly comply with all such directives, mandates, suggestions or requirements at Tenant's sole cost and expense.

8. ALTERATIONS AND IMPROVEMENTS.

A. The parties acknowledge that the Leased Premises will require alterations and improvements to accommodate the permitted use herein. Tenant may, from time to time, add or make such improvements and add such fixtures, alterations, and additions to the Leased Premises as Tenant, in its sole and absolute discretion, deems necessary and appropriate to its use and occupation of the Leased Premises. The written notice to Landlord shall include a complete description of the proposed addition, alteration or improvement, copies of any and all plans and specifications pertaining to the proposed addition, alteration or improvement and a certification from an engineer, licensed in Pennsylvania, that the proposed addition, alteration or improvement will not exceed the capacity of or cause damage to the Leased Premises. Tenant shall only employ licensed contractors to make all additions, alterations and improvements to the Leased Premises. Tenant shall not self perform any additions, alterations or improvements to the Leased Premises. Tenant shall pay all costs incurred or arising out of the making or addition of such improvements, fixtures, alterations, or additions to the Leased Premises, and shall not permit any liens or other encumbrances to be filed or otherwise served against the Leased Premises or any portion thereof. Upon request of Landlord, Tenant shall
deliver to Landlord proof of payment reasonably satisfactory to Landlord of all costs incurred or arising out of the addition of any such improvements, fixtures, alterations, or additions.

B. Upon the termination of this Lease Agreement, all fixtures shall remain on the premises. All personal property shall be removed from the Tenant, at the Tenant’s expense, within ninety (90) days of the termination of the Lease.

9. **QUIET ENJOYMENT.** Landlord warrants and represents that it has full and complete right, power, and authority to execute and perform this Lease Agreement and to grant the estate described herein, that it is the sole owner of the Leased Premises, and that Tenant shall peaceably and quietly have, hold, and enjoy the Leased Premises during all terms of this Lease Agreement.

10. **UTILITIES.** Tenant shall pay all charges for telephone, gas, electricity, well water, and other utilities used in or on the Leased Premises and shall hold Landlord free from and harmless against any and all liability therefor. In the event the existing power or water service serving the property is insufficient to service the Tenant’s use of the Leased Premises, Tenant shall be solely responsible for acquiring additional water and power to sufficiently supply Tenant’s use of the Leased Premises. All cost of acquiring additional water and power to the Leased Premises shall be at Tenant’s sole cost and expense. Tenant shall also be responsible for arranging and paying for any specialized waste disposal (solid or otherwise) of any waste created in connection with Tenant’s business operations.

11. **RIGHT OF ENTRY.** Landlord shall have the right, during normal business hours upon prior notification to Tenant, to enter the Leased Premises for the purposes of inspecting the condition thereof and for any other reasonable purpose. Notwithstanding same, Landlord acknowledges that access to the leased premises is restricted by 35 P.S. §10231.101 et. seq. and the regulations promulgated thereunder and he shall comply with all regulations and laws regarding entry of a medical marijuana facility, including but not limited that Landlord must be accompanied by authorized Tenant personnel while inspecting limited access areas. Said restrictions to the right of entry shall apply to Landlord and those entering on his behalf, including but not limited to his employees, representative and contractors.

12. **INDEMNITY.**

A. Landlord shall not be liable to Tenant or to Tenant’s employees, agents, or visitors for any injury to persons, or damage to property on or about the Leased Premises caused by the negligence or misconduct of Tenant, his employees, agents, or visitors, or any other person entering the Leased Premises under the expressed or implied invitation of Tenant arising out of or during the use and occupancy of the Leased Premises by Tenant and the conduct of his activities thereon, or arising out of any breach or default by Tenant in the performance of his obligations hereunder, and Tenant hereby agrees to defend, indemnify, and hold Landlord free from and harmless against any losses, expenses, or claims which shall arise or result directly or indirectly from or in conjunction with any act or omission of, or any default under the terms and provisions of this Lease Agreement by Landlord, unless such injury, damage, loss, expense or claim is caused by or result from (A) the negligence or willful misconduct of Landlord or any of
Landlord’s employees, contractors or representatives, or any Person coming upon the leased Premises at the request or by the permission of Landlord or (B) any default by Landlord.

13. CONDEMNATION.

A. In the event that, during any term of this Lease Agreement, the whole or any portion of the Leased Premises shall be taken in any manner or for any public or quasi-public use under any governmental law, ordinance, or regulation, or by right of eminent domain, or should be sold to the condemning authority under threat of condemnation, this Lease Agreement shall forthwith cease and terminate and the rent shall be abated during the unexpired portion of this Lease Agreement effective from the date of the actual taking of the Leased Premises by the condemning authority.

B. In the event of termination as heretofore provided, this Lease Agreement shall expire as of the date of such termination in the same manner and with the same effect as if it were the date heretofore set for the expiration of the initial Term, or if exercised, the Renewal Term hereof.

C. In the event of any condemnation or taking heretofore mentioned, Tenant shall be entitled only to receive that portion of the award in any condemnation proceeding representing the value of any improvements, fixtures, alterations, or additions to the Leased Premises made by Tenant and lost as a result of such condemnation proceeding, and Landlord shall be entitled to receive the balance of such award.

14. INSURANCE.

A. Tenant shall at its own expense, during the term of this Lease, keep all buildings and structures on Leased Premises insured against loss or damage by fire, with extended coverage, to include direct loss by windstorm, hail, explosion, riot, or riot attending a strike, civil commotion, aircraft, vehicles and smoke, in the aggregate amount of not less than the reasonable and insurable market value thereof. Tenant shall cause landlord to be named as an Additional Insured on such insurance policy.

B. Tenant shall furnish Landlord with certificates of all insurance required by this paragraph. Tenant agrees if he does not keep such insurance in full force that Landlord may notify Tenant of such failure and if Tenant does not deliver to Landlord within ten days after such notice certificates showing all such insurance to be in full force and effect, Landlord may, at its option take out the necessary insurance to comply with the provisions hereof and pay the premiums on the items specified in such notice and Tenant covenants thereupon demand to reimburse and pay Landlord any reasonable amount so paid or expended in the payment of the insurance premiums required hereby and specified in the notice, with interest thereon at the rate of ten percent per annum from the date of such payment by Landlord until repaid by Tenant.

15. DEFAULT BY TENANT. The following events, exclusive of all others, shall be deemed to be events of default by Tenant under the terms of this Lease Agreement.
A. Failure of Tenant to pay any installment of rent or other sums payable to Landlord hereunder on the date that same is due, and such failure shall continue for a period of ten (10) business days after receipt by Tenant of Landlord’s written notification thereof.

B. Failure of Tenant to comply with any term, condition, or covenant of this Lease Agreement, other than the payment of rent or other sum of money, and such failure shall not be cured, or the cure thereof may not be commenced and diligently prosecuted by Tenant, within sixty (60) days after Tenant’s receipt of Landlord’s written notice thereof.

C. In the event Landlord is required to remove or evict Tenant from the Leased Premises, Landlord may enlist the assistance of any federal, state or local government agencies, including law enforcement agencies or other person properly licensed or otherwise authorized in the state of Pennsylvania for the cultivation of legalized marijuana and preparation of legalized marijuana products pursuant to 35 P.S. §10231.101 et. seq. and the regulations promulgated thereunder to take possession of any of Tenant’s property, inventory, goods, fixtures and equipment remaining in the Leased Premises and Landlord shall not be liable to Tenant for the detention, confiscation or loss thereof, but only to the extent that the value of same does not exceed the value of any damages for which the Landlord claims is owed by Tenant due to said default.

16. WAIVER OF DEFAULT. No waiver by either of the parties hereto of any default or breach of any term, condition, or covenant of this Lease Agreement shall be deemed to be a waiver of any subsequent or continuing default or breach of the same or any other term, condition, or covenant contained herein.

17. WAIVER OF SUBROGATION. Tenant waives each and every claim which arises or may arise in its favor against the Landlord during any term of this Lease Agreement for any and all loss of, or damage to, any of its property located within or upon, or constituting a part of the Leased Premises, which loss or damage is covered by valid and collectable fire and extended coverage insurance policies, to the extent that such loss or damage is recoverable under such insurance policy.

18. ATTORNEY’S FEES. If, as a result of any breach or default by Landlord or Tenant of their respective obligations under this Lease Agreement, it shall become necessary for the nondefaulting party to employ an attorney or attorneys to enforce or defend any of its rights or remedies hereunder, and such nondefaulting party shall prevail, the nondefaulting party shall be entitled to any reasonable attorneys’ fees and costs so incurred.

19. ASSIGNMENT OR SUBLETTING. Tenant shall not assign or sublet this Lease Agreement or any portion hereof without the prior written consent of Landlord, which consent for assignments/subleases should not be unreasonably withheld, conditioned or delayed.

20. FORCE MAJEURE. In the event that performance by either of the parties hereto of any term, condition, or covenant of this Lease Agreement, other than the payment of Rent or Additional Rent, is delayed or prevented by any act of God, strike, lock-out, restriction by any governmental authority, civil riot, flood, and any other cause not within the control of the party
so delayed or prevented, the period for performance of such term, condition, or covenant shall be extended for a period equal to the period of such delay or prevention.

21. **SUCCESSORS.** All terms, conditions, and covenants contained in this Lease Agreement shall apply to, inure to the benefit of, and be binding upon all parties hereto and upon their respective successors-in-interest, heirs, executors, administrators, and legal representatives.

22. **SEVERABILITY.** In the event that any provision or provisions of this Lease Agreement is determined to be invalid or unenforceable at law or in equity, this Lease Agreement shall remain in full force and effect and shall be interpreted and construed to the maximum extent possible as if such invalid or unenforceable provision or provisions were not present.

23. **NOTICES.** Any notice or document required to be delivered hereunder will be considered sufficient only if deposited into the United States Postal System, postage prepaid, certified mail – return receipt requested, and properly addressed to the respective party at the addresses indicated below or at such other addresses as may have therefore been specified by written notice in accordance herewith. Notice shall be deemed to have occurred upon the date received by the recipient. Each party may change the address for notice to the other by giving written notice of that change in accordance with the provisions of this paragraph.

**LANDLORD:**
Lotus Land, LLC
Attn: George E. Christianson, Esq.
411 Chestnut Street
Lebanon, Pennsylvania 17042
E-mail: [REDACTED]

**TENANT:**
Lebanon Business Associates
t/d/b/a Lebanon BioPharma, LLC
Attn: [REDACTED]
815 Cumberland Street
Lebanon, PA 17041
E-mail: [REDACTED]

24. **MERGER.** This Lease Agreement constitutes the only and entire agreement between the parties hereto concerning the Leased Premises, and there are no other outstanding agreements, covenants, or understandings between the parties hereto that are not set forth herein.

25. **AMENDMENTS.** This Lease Agreement may not be amended without the prior written consent of both of the parties hereto.

26. **JURISDICTION & VENUE.** In any dispute arising out of this transaction, Landlord and Tenant submit to the jurisdiction of the local, state or federal court that encompasses the County in which the Premises is located. Additionally, Landlord and Tenant agree that venue lies in said local, state or federal courts.
27. **HAZARDOUS SUBSTANCES.** Landlord agrees to defend fully, indemnify, and hold entirely free and harmless Tenant from and against all claims, judgments, damages, penalties, fines, costs, liabilities or losses (including, without limitation, sums paid in settlement of claims, attorneys' fees, consultant fees, and expert fees) that arise during or after the term of the Lease and that are imposed on, paid by or asserted against Tenant by reason or on account of, or in connection with, or arising out of the presence or suspected presence of Hazardous Materials (as that term is defined in Section 101(14) of the Comprehensive Environmental Response, Compensation, and Liability Act, 42 USC 9601 (14)) or toxic substances on or in the Leased Premises or any portion thereto, or the violation of any Environmental Law, except to the extent that the Hazardous Material is present or the violation occurred as a result of Tenant's activities on or in the Leased Premises. Such agreement shall apply regardless of the basis of liability or legal principal involved (including, without limitation, contract, warranty, negligence, strict liability, or other tort, violation of law, or otherwise), and shall apply whether or not such costs, claims, losses, liabilities, or other expenses, are caused, in whole or in part, by any contributory negligence or by the sole expenses covered under this paragraph include, without limitation, those for damage to or of environmental statutes, regulations, ordinances, or other governmental requirements; injury to or death of any person; or allegations of any of the foregoing.

28. **UNDERGROUND STORAGE TANKS.** Landlord warrants and represents to Tenant there are no underground storage tanks of other containers on or in the Leased Premises.

29. **NO RECORDATION.** Tenant shall not record this Lease Agreement, or any memorandum of notice thereof, without the express written consent of Landlord.

30. **LANDLORD'S REPRESENTATIONS.** Landlord represents and warrants to Tenant that, as of the date of this Lease, the following are true and correct, and shall be true and correct as of the Commencement Date:

   A. Landlord is the holder of both legal and equitable title to the Leased Premises.

   B. The Leased Premises are not encumbered by or subject or subordinate to any agreement, lease, condition, contract, covenant, declaration, easement, encumbrance, judgment, lien, mortgage, option, reservation or restriction of any nature.

   C. There is no action pending or, to the knowledge of Landlord threatened, which relates to or arises out of the ownership, use or occupancy of the Leased Premises, or which arises by reason of any violation or alleged violation of any applicable law with respect to the Leased Premises.

   D. No approval, consent or permission of any person or entity is necessary in conjunction with the authorization, execution, delivery and performance by Landlord of this Lease.
IN WITNESS WHEREOF, the parties hereto have set their hands on the day and year first above written.

LANDLORD:
Lotus Land, LLC
By: George D. Christianson
Dated: 2/27/17
Title: Owner

TENANT:
Lebanon Business Associates
d/b/a Lebanon BioPharma, LLC
By: Geoff Rich
Dated: 2-27-17
Title: Vice President

WITNESS:
Nancy M. Fisher

Page 10 of 11
Exhibit “A”
February 17, 2017

DEED DESCRIPTION FOR LANDS OF LOTUS LAND LLC, SITUATED IN SOUTH LEBANON TOWNSHIP, LEBANON COUNTY, PA.

COMMENCING at a point in the Center line of State Drive (SR-2003), said point being the Northwestern corner of lands of Raymae Limited Partnership; Thence through lands of Lotus Land LLC, (Deed Book 2097, Page 3363), N.19°-44′-48″E. a distance of 1533.75 feet to the place of BEGINNING.

Thence through said lands of Lotus Land LLC, (Deed Book 2097, Page 3363), the following four courses and distances, (1) Thence N.00°-04′-33″E. a distance of 372.31 feet to a point; (2) Thence S.89°-55′-27″E. a distance of 585.00 feet to a point; (3) Thence S.00°-04′-33″W. a distance of 372.31 feet to a point; (4) Thence N.89°-55′-27″W. a distance of 585.00 feet to the place of BEGINNING.

CONTAINING 5.00 ACRES.

BEING A PORTION OF DEED RECORDED IN DEED BOOK 2097, PAGE 3363.
DOH REDACTED
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
County of York

The undersigned, K. Michelle Gaughan, 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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<tbody>
<tr>
<td>Maria Dorf</td>
<td>Principal</td>
<td>Seven Point Dispensary</td>
<td>Owner</td>
<td>2015-present</td>
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<td>Chicago, IL</td>
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<td>Nevada Natural Treatment</td>
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<td>Julie Nagle</td>
<td>Principal</td>
<td>Progressive Treatment</td>
<td>Owner</td>
<td>2015-present</td>
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<td>George Archos</td>
<td>Principal</td>
<td>Ataraxia LLC</td>
<td>Owner</td>
<td>2015-present</td>
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<td>Albion, IL</td>
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<td>Glen Burnie, MD</td>
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</tbody>
</table>
I hereby certify that I am authorized to execute this affidavit on behalf of the applicant and that the information contained herein is true and correct and that there is no misrepresentation, falsification or omissions in this affidavit. I am further aware that any false or misleading statement or omitted information is punishable under the applicable provisions of 18 Pa. C.S. Ch. 49 (relating to falsification and intimidation).

Signature of Affiant and Title

Date

Sworn to and subscribed before me this _15 th_ day of March, 2017.

Notary Public

My Commission Expires:

April 9, 2018

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 [illegible]

The undersigned, Kibibi Caughan, 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
Date 3/15/17

Sworn to and subscribed before me this _______ day of __________, 2017.

[Signature]
Notary Public

COMMONWEALTH OF PENNSYLVANIA
NOTARIAL SEAL
KRISTINA MCCLOSKEY
Notary Public
CITY OF LEBANON, LEBANON COUNTY
My Commission Expires Apr 9, 2018

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 1-1: 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 Lebanon

I/we Kibibi Gaughan

For the following applicant:

Lebanon BioPharma LLC
NAME OF BUSINESS

1594 Cumberland Street #300
ADDRESS

Lebanon PA 17042
CITY STATE ZIP CODE

Lebanon 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</th>
<th>If on deposit, name and address of financial</th>
<th>If on deposit, account number</th>
</tr>
</thead>
</table>
I hereby certify that I am authorized to execute this affidavit on behalf of the applicant and that the information contained herein is true and correct and that there is no misrepresentation, falsification or omissions in this affidavit. I am further aware that any false or misleading statement or omitted information is punishable under the applicable provisions of 18 Pa. C.S. Ch. 49 (relating to falsification and intimidation).

[Signature of Affiant and Title] 3/15/17

Sworn to and subscribed before me this 5th day of March, 2017

[Signature of Notary Public]

COMMONWEALTH OF PENNSYLVANIA
NOTARIAL SEAL
KRISTINA MCCLOSKEY
Notary Public
CITY OF LEBANON, LEBANON COUNTY
My Commission Expires Apr 9, 2018

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

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

| Business Name, as it appears on the applicant’s certificate of incorporation, charter, bylaws, partnership agreement or other official documents: | Lebanon BioPharma LLC |
| Trade names and DBA (doing business as) names: | N/A |
| Principal Business Address: 1594 Cumberland Street #300 | |
| City: Lebanon | State: PA | Zip Code: 17042 |
| Phone: **DOH REDACTED** | Fax: N/A | Email: lebanonbiopharma@gmail.com |
LEBANON BIOPHARMA

MEDICAL MARIJUANA

LIQUID SPRAY

12 FL oz (354ml)

Brower/Processor: Lebanon BioPharma LLC
3000 State Drive
South Lebanon Township, PA 17042
Permit #1786-1893

Dispensary: Lebanon Wellness LLC
3000 State Drive
South Lebanon Township, PA 17042
Permit #1893-1178

DOSAGE

3.0mg THC
5.0mg CBD
per 15ml

CANNABINOID PROFILE

<table>
<thead>
<tr>
<th>THC</th>
<th>CBD</th>
<th>CBDA</th>
<th>CBG</th>
<th>CBN</th>
</tr>
</thead>
<tbody>
<tr>
<td>0.05%</td>
<td>0.03%</td>
<td>0.03%</td>
<td>0.02%</td>
<td></td>
</tr>
</tbody>
</table>

PRODUCT INFORMATION

Expiration Date: 02/13/2027
Harvest Batch: 10D045667
Process Lot: 09H0590K
Packaged On: 02/01/2027
Packaged By: +17F366-221
Shipped By: JMC7-123

INGREDIENTS

Extracted Medical Marijuana, Fraccionated Coconut Oil MCT
(SPI, Polyoxyethylene-80 [MEO] and Ethanol [ESI])

Dimensions: 2.5” x 6.75”

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LEBANON BIOPHARMA

MEDICAL MARIJUANA

OIL

8 FL oz (236ml)

Brower/Processor: Lebanon BioPharma LLC
3000 State Drive
South Lebanon Township, PA 17042
Permit #1786-1893

Dispensary: Lebanon Wellness LLC
3000 State Drive
South Lebanon Township, PA 17042
Permit #1893-1178

DOSAGE

10.0 mg THC per 15ml

CANNABINOID PROFILE

<table>
<thead>
<tr>
<th>THC</th>
<th>CBD</th>
<th>CBDA</th>
<th>CBG</th>
<th>CBN</th>
</tr>
</thead>
<tbody>
<tr>
<td>0.06%</td>
<td>0.04%</td>
<td>0.03%</td>
<td>0.02%</td>
<td></td>
</tr>
</tbody>
</table>

PRODUCT INFORMATION

Expiration Date: 02/13/2027
Harvest Batch: 10D045667
Process Lot: 09H0590K
Packaged On: 02/01/2027
Packaged By: +17F366-221
Shipped By: JMC7-123

INGREDIENTS

Extracted Medical Marijuana, Glycerine (USP), Propylene Glycol (USP), Sorbitol, Vitamin E, Polyoxyethylene Glycol
Succinate (USP/IPS), Purified Water, Ethanol (USP)

Dimensions: 2.5” x 6.75”

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LEBANON BIOPHARMA

MEDICAL MARIJUANA

PILLS

16 CAPSULES

Brower/Processor: Lebanon BioPharma LLC
3000 State Drive
South Lebanon Township, PA 17042
Permit #1786-1893

Dispensary: Lebanon Wellness LLC
3000 State Drive
South Lebanon Township, PA 17042
Permit #1893-1178

DOSAGE

25mg THC
50mg CBD
per capsule

CANNABINOID PROFILE

<table>
<thead>
<tr>
<th>THC</th>
<th>CBD</th>
<th>CBDA</th>
<th>CBG</th>
<th>CBN</th>
</tr>
</thead>
<tbody>
<tr>
<td>0.06%</td>
<td>0.04%</td>
<td>0.03%</td>
<td>0.02%</td>
<td></td>
</tr>
</tbody>
</table>

PRODUCT INFORMATION

Expiration Date: 02/13/2027
Harvest Batch: 10D045667
Process Lot: 09H0590K
Packaged On: 02/01/2027
Packaged By: +17F366-221
Shipped By: JMC7-123

INGREDIENTS

Extracted Medical Marijuana, PMMC Capsule, Microcrystalline Cellulose, Sodium Starch Glycolate

Dimensions: 2.5” x 6.75”

---

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.

---

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.

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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.
LEBANON BIOPHARMA
MEDICAL MARIJUANA
TINCTURE
12 FL oz (354ml)

DOSAGE

EQUAL
3.0mg THC

THC/CBD
3.0mg CBD per 15ml

CANNABINOIDS PROFILE

THC: 0.79%
CBD: 0.04%
THCA: 0.05%
THCV: 0.1%
CBDA: 0.1%
CBDA: 0.1%
CBGA: 0.1%
CBGA: 0.1%

PRODUCT INFORMATION

Expiration Date: 02/12/2020
Harvest Batch: 100948697
Process Lot: 0990487KR
Packaged On: 02/01/2020
Packaged By: 3KTH24-221
Shipped By: JANC77-489

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 (99%), Polysorbate-80 (0.1%) and Ethanol (0.1%)

Dimensions: 2.5” x 6.75”

LEBANON BIOPHARMA
MEDICAL MARIJUANA
TOPICAL CREAM
12 FL oz (354ml)

DOSAGE

EQUAL
3.0mg THC

THC/CBD
3.0mg CBD per 15ml

CANNABINOIDS PROFILE

THC: 0.79%
CBD: 0.04%
THCA: 0.05%
THCV: 0.1%
CBDA: 0.1%
CBDA: 0.1%
CBGA: 0.1%
CBGA: 0.1%

PRODUCT INFORMATION

Expiration Date: 02/12/2020
Harvest Batch: 100948697
Process Lot: 0990487KR
Packaged On: 02/01/2020
Packaged By: 3KTH24-221
Shipped By: JANC77-489

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, Oak Berry, Artemisia, Cassia Seed, Schizonepeta.

Dimensions: 2.5” x 6.75”

LEBANON BIOPHARMA
MEDICAL MARIJUANA
TOPICAL GEL
12 FL oz (354ml)

DOSAGE

EQUAL
3.0mg THC

THC/CBD
3.0mg CBD per 15ml

CANNABINOIDS PROFILE

THC: 0.79%
CBD: 0.04%
THCA: 0.05%
THCV: 0.1%
CBDA: 0.1%
CBDA: 0.1%
CBGA: 0.1%
CBGA: 0.1%

PRODUCT INFORMATION

Expiration Date: 02/12/2020
Harvest Batch: 100948697
Process Lot: 0990487KR
Packaged On: 02/01/2020
Packaged By: 3KTH24-221
Shipped By: JANC77-489

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, Oak Berry, Artemisia, Cassia Seed, Schizonepeta.

Dimensions: 2.5” x 6.75”
## Lebanon Biopharma

### Medical Marijuana

#### Topical Ointment

- **12 FL oz (354ml)**

#### Dosage

<table>
<thead>
<tr>
<th><strong>Cannabinoid Profile</strong></th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>THC</strong></td>
</tr>
<tr>
<td><strong>CBD</strong></td>
</tr>
<tr>
<td><strong>THCA</strong></td>
</tr>
<tr>
<td><strong>CBDA</strong></td>
</tr>
<tr>
<td><strong>CBN</strong></td>
</tr>
<tr>
<td><strong>CBG</strong></td>
</tr>
</tbody>
</table>

**Product Information**

- **Expiration Date:** 01/31/2027
- **Harvest Batch:** THC01F567
- **Process Lot:** THC01F567
- **Packaged On:** 02/10/2017
- **Packaged By:** AN0004-221
- **Shipped By:** JAN007-489

#### Ingredients

- Astragulus Root
- Ginseng Root
- Ledebouria Root
- Angelica
- Dill Berry
- Artemisia
- Cassia Seed
- Schisandraea

---

### Medical Marijuana

#### Vaporization Cartridge

- **12 FL oz (354ml)**

#### Dosage

<table>
<thead>
<tr>
<th><strong>Cannabinoid Profile</strong></th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>THC</strong></td>
</tr>
<tr>
<td><strong>CBD</strong></td>
</tr>
<tr>
<td><strong>THCA</strong></td>
</tr>
<tr>
<td><strong>CBDA</strong></td>
</tr>
<tr>
<td><strong>CBN</strong></td>
</tr>
<tr>
<td><strong>CBG</strong></td>
</tr>
</tbody>
</table>

**Product Information**

- **Expiration Date:** 01/31/2027
- **Harvest Batch:** THC01F567
- **Process Lot:** THC01F567
- **Packaged On:** 02/10/2017
- **Packaged By:** AN0004-221
- **Shipped By:** JAN007-489

#### Ingredients

- Extracted Medical Marijuana and Fractionated Coconut Oil (MC) (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: Lebanon BioPharma LLC
       Applicant’s Name

I, Kibibi Gougham, 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 15th day of March, 2017.

[Signature]
Authorized Signature

STATE OF

COUNTY OF

On this 15th day of March, 2017, before me, a Notary Public, personally appeared (known to me or satisfactorily proven) to be the person whose name is subscribed in this Release, and acknowledged that he/she executed the same for the purposes herein contained.

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

[Signature]
Notary Public

MY COMMISSION EXPIRES:

April 9, 2018

COMMONWEALTH OF PENNSYLVANIA

UNIVERSAL SEAL
KRISTINA MccLOSKEY
Notary Public
CITY OF LEBANON, LEBANON COUNTY
My Commission Expires Apr 9, 2018
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:
Lebanon BloPharma LLC

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

Principal Business Address: 1594 Cumberland Street #300
City: Lebanon State: PA Zip Code: 17042
Phone: DOH REDACTED Fax: N/A Email: lebanonblopharma@gmail.com

A. Priorities for Multiple Grower/Processor Permit Applications

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

MEDICAL MARIJUANA REGION | 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)
---|---
1- Southeast | Priority ___
2- Northeast | Priority ___
3- Southcentral | Priority 1 ___
4- Northcentral | Priority ___
5- Southwest | Priority ___
6- Northwest | Priority 2 ___
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
                        | Blair
                        | Cumberland
                        | Dauphin
                        | York
| 3- Southcentral          | Centre
                        | Lycoming
                        | Allegheny
                        | Butler
                        | Washington
                        | Westmoreland
| 4- Northcentral          |
| 5- Southwest             | Erie
                        | McKean
| 6- Northwest             |
EMPLOYEE QUALIFICATIONS, DESCRIPTION OF DUTIES AND TRAINING

A. Duties, Responsibilities and Roles

Chief Medical Officer: Dr. Kibibi Gaughan
- As Chief Medical Officer Gaughan is in charge of overseeing all duties related to patient needs in the market and product manufacturing. The Chief Medical Officer gives direction to the medical advisory board and the lead manager in the Cultivation center.

Chief Financial Officer: Brian Ammerman
- The Chief Financial Officer reports directly to the CEO and works with the COO in assisting on all strategic matters relating to budget management, cost benefit analysis, patient forecasting and daily Cultivation expenses.

Chief Executive Officer: Dr. Glen Mesaro
- The Chief Executive officer is the leading role in the Cultivation center. Mesaro is in charge of overseeing the COO and CFO and the growth and direction of the Cultivation. As well the CEO acts as the main point of communication between the executive board, upper Cultivation management and State officials.

Chief Operations Officer: George Archos
- The Chief Operations officer will oversee all aspects of operations. From cultivation construction to daily growing schedules, Archos will be hands on and direct the day-to-day operations of the Cultivation center. As well, Archos will work directly with the facilities general manager and report to the CEO.

General Manager: Laura DeMaio
- The General Manager is the lead person in regards to daily operations within the Cultivation. The GM will work directly with the floor leads in making sure all patients are taken care of and the all State guidelines and regulations are met.

Patient Outreach: Lois Mease
- The Patient Outreach individual is in charge of hosting weekly patient events within the greater community. The events focus on not only the benefits of medical cannabis but on how patients can receive their medical cards. As well, Mease will work directly with local cultivation in helping them host community events and inform them of our various products we create at the cultivation venter.

Medical Marijuana Research: Marla Dorf
- As the head medical Marijuana researcher Dorf, is in charge of being up to date on all relevant research in regards to strains, products and patient studies. Dorf will work directly with the cultivation manager and head horticulturist in efforts to propel our breading and research program.

Community Relations: Maryann Keith
-The Community Relations officer is in charge of enacting the community benefits program and working with various community leaders. Keith will work to make sure the benefits program is implemented within the community. As well, Keith will work directly with the patient outreach leader and store manager in relaying all information from the community.

Security Manger: Bob Logan
-The Security Manager will be in charge of all aspects of security inside and outside of the Cultivation area. The Cultivation manager will also be in charge of working with the various dispensaries in ensuring all deliveries are secure. Logan will also work with the cultivation manager in making sure all security measures are enacted within the facility.

Financial Backer: Julie Nagel
-The financial backer role is an integral part of the back end operations. All financial backers have been chosen due to their successful careers in business and understanding start-up operations. As well, financial backers will ensure that the Cultivation center has more than adequate financing for all aspects of operations for many years to come.

Medical Advisory Board: Dr. Amy Wescott
-Our medical advisors in our Cultivation have vast backgrounds in the medical profession. As a medical advisor will work directly with the medical marijuana researcher, lead cultivation and cultivation manager to ensure we are up to speed on all the new medical strains and research.

Medical Advisory Board: Dr. Anne Hayes
-Our medical advisors in our Cultivation have vast backgrounds in the medical profession. As a medical advisor will work directly with the medical marijuana researcher, lead cultivation and cultivation manager to ensure we are up to speed on all the new medical strains and research.

Medical Advisory Board: Dr. Maria Dickie
-Our medical advisors in our Cultivation have vast backgrounds in the medical profession. As a medical advisor will work directly with the medical marijuana researcher, lead cultivation and cultivation manager to ensure we are up to speed on all the new medical strains and research.

Medical Advisory Board: Kristen Vukovich
-Our medical advisors in our Cultivation have vast backgrounds in the medical profession. As a medical advisor will work directly with the medical marijuana researcher, lead cultivation and cultivation manager to ensure we are up to speed on all the new medical strains and research.

Quality Control Manager: Dinny Kinloch
-The quality control manager will work with the Cultivation manager to make sure all of the products we create meet company and States quality regulations. X will make sure
that all grow rooms and extraction areas are inspected daily, all products are consistent in standards and that all products being sent out for delivery are consistent.

**B. Qualifications**

**KIBIBI A.M. GAUGHAN, M.D.:**
A proud resident of Lebanon, PA and currently a physician at Wellspan Family Medicine and Medical Director for Wellspan Good Samaritan Hospital Home Health in Lebanon, Dr. Gaughan earned her undergraduate degree at Boston College and her MD at American University of the Caribbean. She successfully completed her Family Medicine residency at UMass Memorial hospital. A wife and mother of two children, Dr. Gaughan is on the Personnel Committee at Lebanon Country Club. Charitably, she actively supports: Development & Disability Services of Lebanon Valley, the United Way, and Young Survivors Coalition (Breast Cancer). She is a faithful parishioner at St. Paul the Apostle Church in Annville, PA. Dr. Gaughan has a very personal connection to this venture, as her mother suffers from Multiple Sclerosis and deals with muscular pain daily. In addition, Dr. Gaughan sees patients of all ages who are in pain but are unable to tolerate prescription medication – many of whom would benefit greatly from medical marijuana.

**LAURA DEMAIO, OD:**
I am an Optometrist who trained at the Pennsylvania College of Optometry. My husband and I have 2 children, ages 23 and 20. For the past 20 years, I have lived and worked in Lebanon, Pennsylvania. I have worked at Bouquet Mulligan DeMaio Eye Professionals, which has offices in Cleona and Elizabethtown, PA. My business consists of a very busy optometric practice, as well as a state of the art retail optical business. Our business has revenues of 6 million dollars per year. I am very active in the local eye care community, as I provide free eye examinations for patients referred to me by the local free medical clinic. I am very interested in offering my glaucoma patients a possible cannabis treatment option, especially when they are failing our existing forms of treatment. I also have an autistic nephew who resides in Lebanon. I would be very interested to see if cannabis derivatives could be used to help him develop his verbal skills.

**LOIS JEAN MEASE:**
Lois Mease is a service oriented Registered Nurse with more than 25 years background in a large Veterans Medical Center. Her core competencies include compassion, caring and adaptability, as well as excellent communication and time management skills. Lois handles tasks with accuracy and efficiency.

**JULIE NAGLE:**
Julie Nagle has an extensive background in business organizational design and layout, Human Resources and brings professional management skills within the medical
cannabis industry. Ms. Nagle is currently the HR Manager/Co-Owner of Progressive Treatment Solutions (PTS) located in Illinois. PTS was the third cultivation center to receive authorization to grow medical cannabis out of 21 recipients of the coveted medical cannabis licenses. Ms Nagle is proud of the fact that PTS is the only WEBE certified cultivation center in the State of Illinois. Ms. Nagle has built her career and business’s around the notion of treating her employees with dignity while paying a living wage. In addition to the Medical cannabis operation in IL she also owns operations in Nevada and Maryland. Her passion to assist people is what has driven her interest in the newly evolving medical cannabis industry. She can be found volunteering with local small businesses to formalize their business practices and policies. She finds this work rewarding and genuinely enjoys contributing whenever possible. She is an active member of St. Theresa’s Parish in Palatine, were she can be seen volunteering on a regular basis.

MARLA DORF:
Overcoming the obstacles in life is a challenge that we must all face. Whether these challenges are the result of a congenital disorder, or medical affliction later in life, the aid of a compassionate voice can make all the difference. Making a difference has always been Marla’s goal. Receiving a bachelor’s degree in elementary education, Marla’s personal involvement with young children only increased her desire to help others.

Whether it was tutoring a thirteen year old quadriplegic, or assisting the participants in a program for special needs at the North Shore Special Recreation Association (NSSRA). Marla’s goal has always been to make a difference in someone’s life.

Marla’s battle with breast cancer opened a new window in her crusade. She now had to find a way to help others battling cancer. Marla founded the Hearts For Research Foundation, and began successfully raising funds for cancer research. Marla was also an avid supporter of the Y-Me organization, participating in organizing large groups for cancer walks and charity pizza sales.

Marla’s never ending quest for helping others and sharing her compassion took another turn in 2014. She was introduced to the Compassionate Care Act, a statute that allowed the use of medical cannabis in the State of Illinois. Marla’s research in the uses of medical cannabis in the treatments of cancer resulted in her insisting that her family get involved. This involvement has resulted in her family’s participation in multiple states medical cannabis programs.

The achievements of her life have continued to feed her desire to make a difference.

GLEN JOSEPH MESAROS, M.D.:
Dr. Glen Mesaros is a practicing otolaryngologist/head and neck surgeon in the Lebanon community. He Graduated from Harvard University with Honors in 1986 and then completed his medical training at the University of Pittsburgh Medical School in 1992. While at medical school, he also obtained a Masters degree in Pathology for his research in molecular biology. Dr. Mesaros entered the military for his specialty training and spent
six years at Fort Lewis, Tacoma Washington. He stayed on as a staff otolaryngologist at Madigan Army Medical Center and was responsible for the continuing development of residency training. He was then transferred to West Point Military Academy as Chief, Otolaryngology at Keller Army Medical Center. Dr. Mesaros left the military to come to Lebanon PA to raise his family and be a part of the community. He is co-owner of Flex Health and Wellness in Cleona, providing holistic nutritional services and products to the community. In 2015 he founded the Swing for the Troops charity to support local veterans in need. Dr. Mesaros is very involved with treatment and care of patients with advanced cancer of the head and neck.

GEORGE ARCHOS:
George Archos has an extensive background in restaurants, logistics and the medical cannabis industry. Mr. Archos is currently the CEO of Ataraxia Grow and Labs located in Illinois and was the first to receive authorization to grow medical cannabis out of 21 recipients of the coveted medical cannabis licenses. Mr. Archos also owns and operates six well-known and highly successful restaurants including Wildberry Pancakes & Café, Westwood Tavern & Tap and the Scout Waterhouse & Kitchen. With an emphasis on quality and customer experience his establishments have received multiple awards and recognition throughout the Chicagoland area. In addition Mr. Archos also has over seven years of experience in logistics moving crude oil and freight throughout the US and Canada. With sales in excess of $200 million per year and multiple locations throughout the US, Mr. Archos has the knowledge and capability to build, establish and efficiently run companies in a variety of areas and states.

In addition to these companies Mr. Archos also has a background in real estate development and working with various municipalities in gaining government approvals and working together through the construction process of multiple projects.

Through these various businesses Mr. Archos gives back to surrounding communities through charitable donations and volunteer work. He is also closely associated with the Boys and Girl Club and has helped them expand their programs over the years and build nutritional menus for their members.

CHARLES H. KINLOCH:
Professional career originated at the steel foundry Quaker Alloy and 17 years later assumed the position of President. Quaker Alloy had a reputation of producing high quality castings in carbon steel and stainless steel for the nuclear, railroad, chemical, and power-generation industries. Customers included Westinghouse, Ingersoll-Rand, General Electric, Siemens and General Dynamics. Initially hired as an Ultrasonics Technician and progressed through other quality control departments inclusive of Radiography, Non Destructive Examination - Magnaflux, Liquid Penetrant, Brinnell, Charpy and dimensional verification. Moved to the quality assurance department with statistical management of various operations and responsible for a spectrometer that measured chemical analysis and mechanical requirements. Headed the manufacturing operation
inclusive of melting, pouring, cleaning, welding and cleaning prior to the promotion to President.

Current president of Fresh Creative a DBA of DIS,C that specializes in marketing, advertising, branding, digital and interactive for local, national and international clients. Clients include Delta, Armstrong, Franke, Kronospan, and Multi Housing Depot.

Community involvement with the United Way, WellSpan Good Samaritan Hospital, City of Lebanon, Chairman of the Business Improvement District recruitment committee, Community of Lebanon Association, Lebanon Valley Chamber of Commerce, Volunteers in Medicine, PIAA, Lebanon Valley Tourist Bureau, Local Street Fair, YMCA, Aurora Services, Lebanon School District, Lebanon Farmers Market, and volunteer basketball referee for youth programs. Recently spoke at the Chamber of Commerce CEO forum. NIDMA 501 c 3 board participant. Participant in assisting local businesses with Social Media strategy.

**BRIAN G. AMERMAN C.P.A.:**
Brian grew up in Sunbury Pennsylvania after moving to Sunbury from Baltimore when he was four years old. He attended school in the Shikellamy school district. After high school, he attended Penn State and graduated from PSU in 1983. He then moved to Baltimore to work for what is now called Ernst and Young. After five years in Baltimore, Brian’s father and he bought a small accounting practice in Lebanon Pennsylvania and he has been self-employed and managing the practice since 1988. He has 10 employees and specializes in accounting and tax work for a variety of small businesses. He also helped found and later sell an Internet business that was known as SunLink. Brian’s experiences in business, in both running his own business and helping clients with theirs, will help tremendously should the company be successful in the application process.

Brain was diagnosed with Hodgkin's disease in 1976 and had surgery to remove the tumor in late 1976. He then underwent radiation therapy throughout the winter and into the spring of 1977. He had an additional surgery in 1981 but the lump they removed this time was benign fortunately. He has a genuine desire to make medical cannabis safe and available for those who need it. There was anecdotal evidence when he was treated for cancer that it could help improve appetite and keep you strong during radiation and chemotherapy. He began to try marijuana after radiation therapy and it helped immensely in terms of appetite and maintaining strength during therapy.

Brian and his wife have raised three children in Lebanon Pennsylvania and plan on remaining Pennsylvania residents for the foreseeable future. His oldest son now works for the family accounting practice, his daughter is in her second year at the Ohio State University School Of Veterinary Medicine, and his youngest son is a sophomore at Millersville University.
BOB LOGAN:
My early career began when I enlisted in the United States Marine Corps, where I spent four years. Following my enlistment, I entered the Pennsylvania State Police, where I was employed for 26 years. During these past 26 years, I have had the opportunity for a diverse career. I have worked as a Patrol Unit Member for five years and a Patrol Unit Supervisor for five years. I then had the opportunity to serve as the Staff Services Unit Supervisor 12 years. During my tenure as the Staff Services Unity Supervisor, I served as the Evidence Room Custodial, where I supervised every aspect of the retention and security of evidence. I also supervised the community services officers / public information officers, who were responsible for conducting security site surveys to schools and other public buildings. For the remaining four years, I served as the Criminal Investigation Unit Supervisor, where I was responsible for supervising every criminal investigation occurring within a multi-county geographical location. My vast command related experiences are a testament to my preparedness and abilities to serve in any position requiring attention to detail and critical thinking skills.

NANCY L. MESAROS:
Nancy Mesaros, formally Nancy Goller, Graduated from SUNY Cobleskill in 1983 with a degree in Biology. She joined The New York State Institute for Basic Research in 1984 as an Electron Microscopist and Cellular Immunologist. After 7 years, She left to become a Pharmaceutical Researcher with Bristol-Myers Squibb and remained there for 6 years. After raising 3 children, she returned to the work force as the proprietor of Flex Health and Wellness, a successful Holistic Nutrition Consulting Business in Cleona, PA. Nancy meets with clients, gives health seminars in the community, operates a supplement and health food storefront and is a monthly contributor to a local health information magazine. She is very involved in helping those with chronic disease via holistic and alternative methods. Her clients have conditions that can be helped with the addition of cannabinoids to the treatment spectrum.

AMY M. WESTCOTT, MD CMD FAAHPM:
Amy Westcott is a nationally recognized for both her clinical expertise is in post-acute geriatric palliative care as well as her educational skills. Dr. Westcott is certified in the Stanford Clinical Teaching Framework, has completed the Harvard Palliative Care Education and Practice (PCEP) Program, an AMDA - The Society for Post-Acute and Long-Term Care Certified Medical Director (CMD), a Fellow in the American Academy of Hospice and Palliative Medicine (FAAHPM), and is a two-time recipient of the Geriatric Academic Career Award (GACA) from Health Resources and Services Administration (HRSA). She currently serves as the Teachers Section Chair for the national American Geriatrics Society and is on the board for the regional Pennsylvania Hospice and Palliative Care Network.

ANNE B HAYES, MD:
I am married to my husband, Dan for the past 25 years. We have been residents of Lebanon County for 21 years. I was raised outside of Pittsburgh in
a large family of 13 children. My training has taken me around the state including State College, Philadelphia and central Pennsylvania.

In my medical practice in Internal Medicine in Lebanon, I care for adults of all ages, but primarily focus on geriatrics. I see patients at 4 of our local nursing homes and since the beginning of 2016 have been the Medical Director at the Hyman Caplan Pavilion, which is a Transitional Care Unit affiliated with Wellspan Hospital. I am involved with the Lebanon Free Clinic as a volunteer and since 2011 as the volunteer Medical Director. These outside practice locations have given me an opportunity to treat patients from all walks of life and in all levels of care.

My husband and I have raised our 3 children in Lebanon County and have contributed to many of the activities in which our children have participated through volunteer support. These have included Jack and Jill Preschool, soccer, softball, baseball, karate, lacrosse, theater and the music programs in all levels of their participation and with our church.

I am an avid bicyclist and have a goal of someday doing a 100-mile ride. I also enjoy photography, dancing and spending time with family and friends.

MARIA L. (KERBER) DICKIE:
I was born in Colorado but raised from the age of two in Reading, Pennsylvania. As a young adult, I spent a few years away living in the Pocono Mountains, in Cambridge, MA and visiting Europe. But I am very happy to have returned to eastern Pennsylvania to work professionally and to set down my own family’s roots. My children, now grown, continue to live in our Keystone state as well.

I have been a licensed pharmacist for twenty-five years. I see people every day suffering from chronic pain, mental and physical anomalies and often terminal illnesses. It is always with great care that I hear their stories, listen to their concerns, educate them about their medicines and fill their prescriptions. But there is often a nagging sense that I wish there was more that could be done for those who are chronically ill. With the thousands of FDA approved medications we have at our fingertips, there are still those patients for whom traditional medicine fails. I love to think about options in alternative medicine, non-western treatment of disease, acupuncture and botanical oils and I have heard some very positive experiences with them all. I have always been fascinated by the use of other holistic methods to promote overall wellbeing in addition to the traditional medical route. In conjunction with that, I believe that the medical use of cannabis has true potential to significantly improve the quality of life for some individuals who cannot be fully helped by traditional medicine. I look forward to using my knowledge and training in pharmaceutical science to promote the growth and distribution of cannabis for medicinal needs in our state.
KRISTIN VUKOVICH:
Working and residing in Lebanon, PA, Kristin Vukovich has been the Staff Pharmacist at Wellspan Good Samaritan Hospital for over 18 years. She earned a Bachelor of Science degree in Pharmacy at the College of Pharmacy, University of the Sciences in Philadelphia, PA.
Kristin is a wife and mother with strong ties to the local community. Both professionally and through her charitable/volunteer work, she has touched the lives of many Lebanon County youths through her coaching positions in Rising Star Youth Soccer and Falcon Youth Basketball programs. Her volunteer work at Cornwall Elementary School and as a key member of the Cedar Crest Field Hockey Parents Club has also been very rewarding to Kristin. She is also a proud Pharmacist Counselor for the non-profit Institute for Safe Medication Practices’ (ISMP) “Brown Bag” medication programs to counsel and teach community residents about safe medication compliance.

MARYANN E. KEITH:
Pursuing a degree in Education from Penn State University in Happy Valley was instrumental not only in finding my life partner, but also exposing me to vast opportunities, experiences and thought processes that would shape my life's vision. Being married to Kevin, a Wealth Management Advisor for Merrill Lynch, enabled me to live one of my most important life goals of being a full-time Mom for our three sons. My insatiable desire to interact with others, be involved, and be productive led me to delve into many causes over the early years. Beginning with transforming a coveted, private Jack & Jill Preschool/Kindergarten program into a non-profit organization, raising funds for the National Multiple Sclerosis Society Leadership Class, to leading organizations such as the Newcomer's Club and the Penn State Club of Lebanon during the early years.
Since establishing this pattern, I have enthusiastically continued to participate and embrace many school, athletic, church, civic, social and community organizations through the years. Actively serving on committees as a board member, officer and oftentimes the fundraising chair...it became my life's "work". Throughout our sons' school years, the family became involved in the American Cancer Society's Relay for Life, and our team, Dog's Dawgs, became one of the top fundraising teams in the state of Pennsylvania for ten years. Philanthropy became a passion and a way of life that inspired me to reach beyond places I ever thought I would experience.
Volunteering through our son Tyler's Boy Scout Troop, I became involved in an extraordinary international non-profit organization called American Foundation for Children with AIDS. AFCA's mission is to raise funds for medicine, and to gather supplies and medical equipment to be shipped in cargo containers to 25 clinics we serve in sub-Saharan African countries. All in order to provide hope and health to HIV+ children and their families. In July 2012, I had the extreme fortune and opportunity through AFCA to Climb Mt. Kilimanjaro in Tanzania Africa, as part of a fundraiser called "Climb Up So Kids Can Grow Up". Capping off this remarkable event, our team was able to visit and volunteer in one of the clinics we serve in Mombasa, Kenya.
immediately following the Climb. It was incredibly amazing to see the difference AFCA made in the lives of these children with the money we had raised. These children NEVER would have received so much without the generous spirit of so many. I saw poverty I never thought was possible, living conditions that were deplorable, but most importantly, hope, faith and a strength in the human spirit that warmed my heart beyond belief. I am still involved with this life-changing organization today.

My philanthropic trail has most recently led me to become involved in another amazing international non-profit organization called Girls on the Run. It is a physical activity-based, positive youth development program for girls in third through eighth grade which enhances girls’ social, psychological, and physical competencies. We believe that every girl can embrace who she is, define who she wants to be, can rise to any challenge, and CAN change the world. I am presently the ambassador and leader of the grass roots expansion of this organization in Lebanon County.

My life now is spent with my husband Kevin, living in Lebanon, supporting his business endeavors and helping them expand through assisting with client development and relationships. We often visit our three grown sons, Chris, Brian and Tyler, in Denver Colorado, New York City and Washington D.C. and have learned so much about new places they are now showing US! I am an avid competitive tennis player and recently started learning yoga. Kevin and I enjoy traveling abroad, hiking through National Parks, skiing in Colorado, cycling the Lebanon Valley Rail Trail with friends and still rooting for our favorite football team...the Penn State Nittany Lions!

C. State Mandated Training

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.
To whom it may concern,

I was born and raised in Lebanon City and have lived most of my life in Lebanon County. I've worked locally as a Registered Nurse and I am now a Nurse Practitioner. The recent legalization of medical marijuana by Governor Tom Wolf in early 2016 is an important step forward for the comprehensive treatment of many medical illnesses, many of which our local population suffers from. I feel strongly as a dedicated provider that the patients I serve will benefit.

Similar to traditional prescription medication, medical marijuana has a high risk of abuse and misuse. It is important for the licensed dispensaries to be operated with high ethical standards and strong medical knowledge as its core competency. Furthermore, it is my belief that the business should be strongly connected to the community it is serving. It is for these reasons that I support Lebanon Biopharma and their core mission to their approach to medical marijuana growth ethically, morally, legally and locally by trained experts, and with medical oversight.

Sincerely,

Justin Molignoni FNP-BC., B.A.
To: Whom it may concern

Pennsylvania Department of Health

I am writing this letter in support of the application for license by Dr. Kibbi Gaughan to operate a Medical Marijuana Growing Site and Processing facility in the State of Pennsylvania.

I specialize in Neurology, Internal Medicine and Sleep Medicine. I see patients on a daily basis with migraine, epilepsy, multiple sclerosis, sleep disorders (insomnia) and chronic pain who may benefit from treatment with medical marijuana.

I have also treated patients with cancer undergoing chemo therapy as well as HIV patients with a wasting syndrome who would benefit from this alternative treatment.

I fully support Dr. Kibbi Gaughan as a respected healthcare professional and business leader for the application and operation of a medical marijuana growing site and processing license in the Commonwealth of Pennsylvania.

Thank you for your consideration,

Dr James D. Nelson, Jr
March 3, 2017

To Whom It May Concern:

RE: Lebanon Biopharma

In consideration that Governor Tom Wolf signed into law the historic and overdue Medical Marijuana Act (P.L. 84, No. 16 Cl. 35), I am in full support of the Lebanon Biopharma as they strive to help patients residing in Pennsylvania receive medical marijuana. As a dedicated consortium of truly local healthcare professionals and business leaders united under the common cause of developing an ethical, transparent, patient-oriented business formed to apply and operate a medical marijuana dispensary license in the Commonwealth of Pennsylvania.

From my perspective as the owner of a Homecare Agency licensed in Pennsylvania, I am confident that many patients including the elderly can benefit from this group of professionals and their mission. Patients in our region who are suffering from life-limiting illnesses will benefit from the plan proposed by the Lebanon Biopharma.

As I'm sure you are aware, much more research is needed to identify the various benefits, however the common understanding that medical marijuana is a valuable treatment option for certain patients is an encouraging first step.

I strongly recommend the Lebanon Biopharma for consideration. I am also available for any questions and can be contacted at my personal contact information listed below.

Sincerely,

[Signature]

Tiffany A. Miller
Owner
RE: Lebanon Biopharma

Dear Committee Members,

This letter is in support of an application made to you by Lebanon Biopharma.
I have known the founding members of this group for many years. They are a group of professionals and I expect them to provide this service for our patients in a professional manner with the focus of their efforts being to provide a quality product for the patients of their community while keeping entirely with the rules and regulations of your Department.

These gentlemen conduct themselves in a professional and respectable way whether it be in their occupations (most of them within the health care profession) or on the golf course. They have reputations within the health care community and the social community of excellence and responsibility. They have a lot a stake. That they do will push them even harder toward achieving their goals of producing and providing a quality and reliable product for other members of their community.

As a practicing gastroenterologist, I look forward to having medicinal marijuana available for my patients. There are multiple situations in my practice where I feel that patients will benefit from their product. I am pleased to hear that their intent is to make that product within easy reach of my patients. I will not hesitate to refer my patients to their dispensary for their medication.

I offer my full support of Lebanon Biopharma.
If I can be of further assistance in your evaluation of their application, feel free to contact me.

Sincerely,

Wayne C. Hoover, MD
Chambersburg Gastroenterology Associates
835 Fifth Avenue
Chambersburg PA.  17201

MD045471E
Re: Lebanon Biopharma

Dear Pennsylvania Department of Health,

As a physician in the Lebanon, Pennsylvania medical community, I would like to support the Lebanon Business Associates as they work to help patients who reside in Pennsylvania to receive medical marijuana, now that Governor Tom Wolf has signed into law the Medical Marijuana Act (P.L. 84, No. 16 Cl.35). Lebanon Biopharma is a dedicated consortium of truly local healthcare professionals and business leaders united under the common cause of developing an ethical, transparent, patient-oriented business formed to apply and operate a medical marijuana dispensary license in the Commonwealth of Pennsylvania.

I am a general surgeon who treats many breast cancer patients in the Lebanon community. I believe there is a role for medical marijuana management for patients with all types of malignant metastatic disease, who are suffering from the ravages of their illness.

I strongly recommend the Lebanon Biopharma for the application and operation of a medical marijuana dispensary license in the Commonwealth of Pennsylvania. I thank you for your consideration.

Sincerely,

Barbara A. Klatchko, M.D.
To whom it may concern,

I was born and raised in Lebanon City and have lived most of my life in Lebanon County. I've worked locally as an Registered Nurse and I am now a Nurse Practitioner. The recent legalization of medical marijuana by Governor Tom Wolf in early 2016 is an important step forward for the comprehensive treatment of many medical illnesses, many of which our local population suffers from. I feel strongly as a dedicated provider that the patients I serve will benefit.

Similar to traditional prescription medication, medical marijuana has a high risk of abuse and misuse. It is important for the licensed dispensaries to be operated with high ethical standards and strong medical knowledge as its core competency. Furthermore, it is my belief that the business should be strongly connected to the community it is serving. It is for these reasons that I support Lebanon Biopharma and their core mission to their approach to medical marijuana growth ethically, morally, legally and locally by trained experts, and with medical oversight.

Sincerely,

Justin Molignoni FNP-BC, B.A.
Dear Pennsylvania Department of Health,

I have been practicing in Lebanon for almost 9 years. I see a fair number of patients with Diabetes Mellitus. Many have complications including peripheral neuropathy. This can cause significant discomfort, impair one's quality of life and sometimes can be disabling. There is preliminary evidence which suggest that Medical Marijuana can be helpful in certain cases of neuropathy and other severe debilitating medical conditions. Medical Marijuana can provide an alternative treatment option for a carefully selected group of patients who are unresponsive to conventional medical therapy. Used correctly it has the potential to provide symptomatic relief and improve one's quality of life. I would support the efforts of Lebanon Biopharma to make this treatment option available.

Ronnie Mohammed MD  
Board Certified in Internal Medicine, 
Diabetes, Endocrinology & Metabolism
To Whom It May Concern

Pennsylvania Department of Health

I am writing this letter in support of the application for license by Lebanon Biopharma to operate a Medical Marijuana Growing Site and Processing Facility in the state of Pennsylvania.

I specialize in Neurology, Internal Medicine and Sleep Medicine. I see patients on a daily basis with migraine, epilepsy, multiple sclerosis, sleep disorders (insomnia) and chronic pain who may benefit from treatment with medical marijuana.

I have also treated patients with cancer undergoing chemo therapy as well as HIV patients with a wasting syndrome who would benefit from this alternative treatment.

I fully support Lebanon Biopharma as a group well-respected healthcare professionals and business leaders for the application and operation of a medical marijuana growing site and processing facility license in the Commonwealth of Pennsylvania.

Thank you for your consideration

Dr. James D Nelson, Jr
February 23, 2017

RE: Lebanon Biopharma

Dear Pennsylvania Department of Health:

I am writing a letter in support of Lebanon Biopharma. I currently serve as Vice President of Lebanon Internal Medicine Associates. Our group is a large multi-specialty internal medicine group in Lebanon, Pennsylvania. Our practice provides care to over 20,000 adult and geriatric patients in the Lebanon, Lancaster and Dauphin counties with a wide variety of medical problems including primary care, rheumatology, endocrinology and nephrology.

We are committed to providing cutting edge medical care to our patients in a caring and local environment. To that end, we strongly support Lebanon Biopharma in their efforts to provide access to medical marijuana under the recently signed Medical Marijuana Act. This group of professionals is committed to providing access to medical marijuana in a method that is highly professional and locally driven. The Consortium of healthcare professionals and business leaders feel strongly that patients in underserved and rural environments have access to the highest level of medical care. They understand the difficulties of our patients in this and other rural environments have in regards to access to medical care. They also understand the need for introducing viable and growing market sectors to these rural environments.

We request that you grant Lebanon Biopharma one of the approved licenses as grower/processor in the Commonwealth of Pennsylvania.

If you would have any questions or require any further information, please do not hesitate to contact me at the above address. Thank you for your consideration.

Sincerely,

Anne B. Hayes, MD
Vice-President, Lebanon Internal Medicine Associates
<table>
<thead>
<tr>
<th>ACTIVITY</th>
<th>EST. DATE</th>
</tr>
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<tbody>
<tr>
<td>State awards cultivation/processing permit</td>
<td>9/1/2017</td>
</tr>
<tr>
<td>Hire Contractor</td>
<td>9/2/2017</td>
</tr>
<tr>
<td>Order Long Lead Time Items</td>
<td>9/2/17</td>
</tr>
<tr>
<td>Finalize Security Contract</td>
<td>9/10/17</td>
</tr>
<tr>
<td>Finalize Drawings with Architect, Structural &amp; MEP Engineers</td>
<td>9/12/17</td>
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<tr>
<td>Apply for Phase 1, Phase 2 Permit and Fence Permit</td>
<td>9/13/17</td>
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<tr>
<td>Begin Hiring Employees to Train at Illinois Facility</td>
<td>9/30/17</td>
</tr>
<tr>
<td>Commence Interior Phase 1 buildout – 7 day per week double shift schedule</td>
<td>10/28/17</td>
</tr>
<tr>
<td>Underground Plumbing Work</td>
<td>11/7/17</td>
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<tr>
<td>Lab Grade Epoxy Flooring</td>
<td>11/15/17</td>
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<tr>
<td>Offices, Lab, Veg Room, Single Flower Room, Packaging, Trim, Vault, Dry, Cure Complete</td>
<td>12/30/17</td>
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<tr>
<td>Receive Certificate of Occupancy</td>
<td>1/3/18</td>
</tr>
<tr>
<td>Pass All Inspections Required to Begin Growing</td>
<td>1/5/18</td>
</tr>
<tr>
<td>Begin Growing Plants</td>
<td>1/6/18</td>
</tr>
<tr>
<td>Finish Phase 2 Construction and Receive Certificate of Occupancy</td>
<td>2/5/18</td>
</tr>
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</table>
PRINCIPALS, FINANCIAL BACKERS, OPERATORS (contd.)

Name: Kibibi A.M. Gaughan M.D.
Occupation: Physician
Title in the Applicant's Business: Chief Medical Officer
Also know as:
Date of birth:
Address:

Phone: DOH REDACTED
Fax: n/a
Email: DOH REDACTED

Name: Laura DeMaio O.D.
Occupation: Optometrist
Title in the Applicant's Business: General Manager
Also know as: Laura Seiling
Date of birth:
Address:
Phone:
Fax: n/a
Email:

Name: Lois Jean Mease R.N.
Occupation: Registered Nurse
Title in the Applicant's Business: Patient Outreach Officer
Also know as:
Date of birth:
Address:

Phone:
Fax: n/a
Email:

Name: Julie Nagle
Occupation: Business Owner
Title in the Applicant's Business: Financial Backer
Also know as:
Date of birth:
Address:

Phone:
Fax: n/a
Email:
Phone: 
Fax: n/a 
Email: 
Name: Glen Joseph Mesaros M.D. 
Occupation: Physician 
Title in the Applicant's Business: Chief Executive Officer 
Also know as: 
Date of birth: 
Address: 
Phone: 
Fax: n/a 
Email: 

Name: George Archos 
Occupation: Cultivation and Dispensary Owner 
Title in the Applicant's Business: Chief Operations Officer 
Also know as: 
Date of birth: 
Address: 
Phone: 
Fax: n/a 
Email: 

Name: Charles H. Kinloch 
Occupation: Advertising Executive 
Title in the Applicant's Business: Quality Control Manager 
Also know as: 
Date of birth: 
Address: 
Phone: 
Fax: n/a
Email: DOH REDACTED

Name: Brian G. Amerman C.P.A.
Occupation: certified public accountant
Title in the Applicant's Business: Chief Financial Officer
Also know as: DOH REDACTED
Date of birth: DOH REDACTED
Address: DOH REDACTED
Phone: DOH REDACTED
Fax: n/a
Email: DOH REDACTED

Name: Robert A. Logan
Occupation: Police Officer
Title in the Applicant's Business: Security Manager
Also know as: DOH REDACTED
Date of birth: DOH REDACTED
Address: DOH REDACTED
Phone: DOH REDACTED
Fax: n/a
Email: DOH REDACTED

Name: Nancy Lillian Mesaros
Occupation: Holistic Nutritionist
Title in the Applicant's Business: Patient Outreach Officer
Also know as: Nancy Lillian Goller
Date of birth: DOH REDACTED
Address: DOH REDACTED
Phone: DOH REDACTED
Fax: n/a
Email: Name: Nancy Lillian Mesaros

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