Medical Marijuana Grower/Processor Permit Application

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

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

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

County: Armstrong

Pennsylvania Department of Health
Medical Marijuana Regions

Region 6 - Northwest
Region 4 - Northcentral
Region 2 - Northeast

Region 5 - Southwest
Region 3 - Southcentral
Region 1 - Southeast
Medical Marijuana Grower/Processor Permit Application

Part A - Applicant Identification and Facility Information

(Scoring Method: Pass/Fail)

For this part, the applicant is required to provide background and contact information for the business or individual applying for a permit.

Section 1 – Applicant Name, Address and Contact Information

Business or Individual Name and Principal Address

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

Commonwealth Medical Alternatives, LLC

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

N/A

Business Address: 100 Grant Street
City: Munhall State: PA Zip Code: 15120
Phone: [REDACTED] Fax: [REDACTED]

☒ Primary Contact or ☐ Registered Agent for this Application

Name: Chuck Knoll
Address: [REDACTED]
City: [REDACTED] State: DOH Zip Code: DOH REDA
Phone: [REDACTED] Fax: [REDACTED]

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)

Facility Name: CMA Grower/Processor Facility
Facility Address: 1676 Freeport Road
City: Kittanning State: PA Zip Code: 16201
County: Armstrong Municipality: North Buffalo Township

☐ 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

[REDACTED]
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.

POLICY STATEMENT
As the Co-Chief Executive Officer of Commonwealth Medical Alternatives (CMA), I am committed to the principles of affirmative action and equal employment opportunity for all individuals. I am currently the owner and CEO for P.E.I Pittsburgh, a manufacturing company, and out of our 40 employees over 50 percent are ethnic minorities, 20 percent are women, and 10 percent are veterans. Diversity and inclusion are embraced, and part of our corporate culture and I insist that these principles be embraced at CMA. Therefore, it is the policy of CMA not to discriminate because an individual is from a diverse group and to take affirmative action to employ and advance in employment qualified and diverse people at all levels within the company.

CMA will ensure that all employment actions, including but not limited to recruitment, hiring, selection for training, promotion, transfer, demotion, layoff, recall, termination, rates of pay or other forms of compensation, will be administered without regard to diversity characteristics. CMA will also provide qualified applicants and employees who are disabled with needed reasonable accommodations, as required by law, and will ensure that all employment decisions are based only on valid job requirements. As part of our commitment, our Armstrong County cultivation / processing facility was purchased, in part, because it is ADA compliant, and we are designing our cultivation rooms to be able to accommodate persons in wheelchairs and those with other disabilities.

CMA prohibits harassment of employees and applicants because they are from diverse groups and will conduct training to try to prevent any harassment or discrimination before it occurs. CMA also prohibits retaliation against employees and applicants for filing a complaint, opposing any discriminatory act or practice, assisting or participating in any manner in a review, investigation, or hearing or otherwise seeking to obtain their legal rights under any Federal, State, or local EEO law requiring equal employment opportunity. Prohibited retaliation includes, but is not limited to,
harassment, intimidation, threats, coercion or other adverse actions that might dissuade someone from asserting their rights.

In furtherance of CMA’s policy regarding affirmative action and equal employment opportunity, CMA has developed a written Diversity Plan that sets forth the policies, practices and procedures that CMA is committed to in order to ensure that its policy of nondiscrimination and affirmative action for qualified persons from diverse groups is accomplished. The Diversity Plan is available for inspection by any employee or applicant for employment upon request, during normal business hours, in CMA’s administrative office located at 100 Grant Street, Munhall, PA 15120. Interested persons should contact an administrator at 100 Grant Street, Munhall, PA 15120 for assistance.

To ensure employment opportunity and affirmative action throughout all levels of CMA, I have designated CMA’s Director of Diversity & Inclusion, Amy Dannemiller, as the Equal Employment Opportunity (EEO) Officer for CMA. The EEO Officer will establish and maintain an internal audit and reporting system that will track and measure the effectiveness of CMA’s Diversity Plan and show where additional action is needed to meet CMA’s objectives.

Tip Paul
20 March 2017
Commonwealth Medical Alternatives, LLC

DIVERSITY STATEMENT

Commonwealth Medical Alternatives believes that each employee is an integral part of its success and upholds the principles of diversity and equal opportunity. We are committed to promoting diversity initiatives that attract qualified candidates who are minority, female, disabled, veteran, or subject to bias in other ways.

CMA supports diversity and inclusion as core business strategies to achieve success and we will adhere to a comprehensive plan that establishes and maintains a diverse staff reflective of the communities in which we operate. Our management team believes that increased diversity will provide us with richer perspectives and approaches to our business.

CMA Diversity Plan & Affirmative Action Plan
CMA is happy to present our official Diversity Plan and Affirmative Action Plan (the “Plan”) for 2017. Although there are many reasons to develop a diversity strategy, we believe we can more effectively serve the diverse community of medical marijuana patients by promoting diverse and inclusive practices throughout our operations.

This Plan describes CMA’s deep-seated commitment to diversity relative to the construction and operation of our cultivation, processing, transportation, and dispensary operations. The Plan outlines specific procedures aimed at ensuring equal opportunity, as well as diversity in employment, contracting, operations and community relations.
CMA will establish a Diversity Committee to oversee, promote, and measure all diversity initiatives for CMA upon successfully securing a permit. The Committee is responsible for advancing the diversity and inclusion strategy by setting strategic direction and managing all aspects of the strategy. Our Chief Executive Officer chairs the Committee, which is comprised of members of senior management, our Director of Security, dispensary managers, and EEO Officer.

Our overall strategy will enable CMA to develop and implement an effective plan for management that drives achievement of positive business results and meets our twin goals of ensuring equal opportunity and promoting diversity in a manner that goes beyond a mere reflection of the local community.

The demographic reality of Southwestern Pennsylvania is that the region lacks racial and ethnic diversity. A 2015 report from the Center on Race & Social Problems at the University of Pittsburgh School of Social Work (“Pittsburgh’s Racial Demographics 2015: Differences and Disparities”) concludes that “Pittsburgh is the Whitest metro area in America with a population of 1 million or more” (pg. 9; see also Appendix 1.2, Pg. 78). The Pittsburgh MSA is 87.1 percent white, and in Armstrong County, where our cultivation / processing facility is located, the percentage of white residents is 97.9. That translates to roughly 400 blacks and 200 Hispanics for the entire county.

Table 3.1
Race & Ethnic Characteristics of Southwestern Pennsylvania (percentage)

<table>
<thead>
<tr>
<th>County</th>
<th>White Alone</th>
<th>Black Alone</th>
<th>Hispanic or Latino Alone</th>
<th>Other: Native American, Alaskan Native American, Hawaiian, Pacific Islander, Asian</th>
</tr>
</thead>
<tbody>
<tr>
<td>Allegheny</td>
<td>81.3</td>
<td>13.3</td>
<td>1.8</td>
<td>5.4</td>
</tr>
<tr>
<td>Armstrong</td>
<td>97.9</td>
<td>0.9</td>
<td>0.7</td>
<td>1.2</td>
</tr>
<tr>
<td>Beaver</td>
<td>91.2</td>
<td>6.3</td>
<td>1.4</td>
<td>2.5</td>
</tr>
<tr>
<td>Butler</td>
<td>96.5</td>
<td>1.2</td>
<td>1.3</td>
<td>2.3</td>
</tr>
<tr>
<td>Cambria</td>
<td>94.0</td>
<td>3.9</td>
<td>1.6</td>
<td>2.1</td>
</tr>
<tr>
<td>Fayette</td>
<td>93.3</td>
<td>4.7</td>
<td>1.0</td>
<td>2.0</td>
</tr>
<tr>
<td>Greene</td>
<td>95.0</td>
<td>3.4</td>
<td>1.3</td>
<td>1.6</td>
</tr>
</tbody>
</table>
It is unacceptable to our ownership and leadership to create a company lacking in diversity and we intend to be very aggressive in meeting internal diversity goals.

DEFINITIONS

Diversity is a phrase that can mean multiple things to people. For CMA “diversity” refers to the similarities and differences among people, in backgrounds and other characteristics, that exist in a society. We support diversity as an inclusive principle and we focus our attention on addressing issues related to those individuals and groups that have historically been adversely affected in social and economic life. This Plan focuses on the differences among people with respect to age, sex, culture, race, ethnicity religion, color, disability, national origin, ancestry, sexual orientation, and veteran status.

INTERNAL DIVERSITY GOALS ADOPTED BY CMA

We are committed to a policy that achieves diversity and we target the following goals:

- Hiring, retaining, and continuously developing talent at all levels of the company that exceeds the cultural and ethnic diversity characteristics of the Southwestern region.
- Supporting the local economy through purchasing goods and services from a diversified group of vendors, contractors, and professional service providers as defined above.
- Maintaining diverse organization vendor spending at or above 20 percent of revenues.
- Conducting events and outreach efforts to patients across the Southwestern region that embraces all ethnicities.
- Increasing cooperation, collaboration, and team-building among employees.
- Enhancing the communities in which we operate through inclusion of all cultures and people.

We will remain an equal opportunity employer and promote diversity where employment practices are concerned. Our EEO is charged with execution of this diversity plan, and will create reports to

<p>| | | | |</p>
<table>
<thead>
<tr>
<th></th>
<th></th>
<th></th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td>Indiana</td>
<td>95.1</td>
<td>2.7</td>
<td>1.3</td>
</tr>
<tr>
<td>Somerset</td>
<td>96.1</td>
<td>2.7</td>
<td>1.3</td>
</tr>
<tr>
<td>Washington</td>
<td>94.2</td>
<td>3.2</td>
<td>1.4</td>
</tr>
<tr>
<td>Westmoreland</td>
<td>95.2</td>
<td>2.5</td>
<td>1.0</td>
</tr>
</tbody>
</table>

benchmark progress, administer policies, direct training, and spearhead new diversity initiatives as part of continuous improvement.

Our plan also applies to contractors, subcontractors, vendors, and suppliers. Commitment to this diversity plan is shared by all members of CMA and includes the following actions:

- Proactively addressing any issues of diversity with our employees, vendors, patients, and the community by being grounded in accountability and ownership.

- Making best efforts to actively solicit a diverse group of employees, contractors, subcontractors, vendors, and suppliers.

- Engaging in frequent communications with our employees, patients, and the community about our commitment to diversity, and promoting other notes of celebration on our website.

- Ensuring that strategic initiatives are developed and executed surrounding diversity in our entire operation.

GOVERNANCE AND RESPONSIBILITIES

The ultimate responsibility for achievement of CMA’s Diversity Plan objectives rests with the CEO; however, the successful implementation requires concerted efforts by all management and staff to accept the tenets of the plan and carry it out in their daily activities.

CMA’s Diversity Committee, consisting of the CEO, executives, managers and the EEO, will oversee the implementation of the Diversity Plan.

Responsibilities of the Diversity Committee & EEO

- Developing Equal Employment Opportunity (EEO) statements, policies, programs and internal and external communication procedures in support of the goals of this Diversity Plan.

- Assisting in the identification of EEO problematic areas including receiving, reviewing and resolving any complaints of discrimination or other non-compliance with regards to equal opportunity and fair treatment of all employees.

- Assisting management in arriving at effective solutions to problems.

- Designing and implementing internal reporting systems that measure the effectiveness of CMA programs designed to support a company culture which fosters diversity in all aspects of goal attainment.

- Keeping the company informed of equal opportunity progress through quarterly reports.

- Reviewing the company’s Diversity Plan with all members of management at all levels to ensure that it is understood and is followed in all HR activities.
Auditing the company’s internal and external posting to ensure compliance information is posted in conjunction with policies and procedures.

It is the responsibility of CMA’s management team to implement this Diversity Plan including:

· Assisting in the identification of potential problem areas, formulating solutions and establishing departmental goals and objectives.

· Reviewing the qualifications of all applicants to ensure qualified individuals are treated in a nondiscriminatory manner when hiring, promotion transfer, and termination actions occur.

· Conducting job performance appraisals in a manner that cultivates an environment of job development and equal opportunity for all employees alike.

· Ensure awareness of the company’s diversity initiatives at all levels of operation.

Responsibilities of Employees

A true focus on Diversity and inclusion actively involves all employees and they are expected to:

· Understand the Diversity Statement and adhere to CMA’s Policies and Practices

· Understand and embrace CMA’s Fair Treatment Policy

· Utilize CMA’s Open-Door Policy and Appeals Process

· Abide by CMA’s Anti-Harassment Policy and Procedure

· Read all communication and notices from our Director of Diversity & Inclusion

VENDORS AND SUPPLIERS

We seek to build and enhance relationships within the communities in which we operate, to raise awareness of CMA, and to identify qualified contractors, vendors, employees, and community organizations to partner with.

We have identified the following minority businesses for construction and vending services, based on a listing from the online, searchable database for Pennsylvania Small & Small Diverse Businesses
### Table 3.2
Small and Diverse Businesses in the Southwestern Pennsylvania Region

<table>
<thead>
<tr>
<th>Certification Type</th>
<th>Number of Firms</th>
</tr>
</thead>
<tbody>
<tr>
<td>Minority Business Enterprise</td>
<td>33</td>
</tr>
<tr>
<td>Minority, Veteran</td>
<td>2</td>
</tr>
<tr>
<td>Minority, Woman</td>
<td>12</td>
</tr>
<tr>
<td>Service-Disabled</td>
<td>14</td>
</tr>
<tr>
<td>Disabled-Owned</td>
<td>1</td>
</tr>
<tr>
<td>Veteran Business</td>
<td>6</td>
</tr>
<tr>
<td>Woman Business</td>
<td>125</td>
</tr>
<tr>
<td>Woman-Disabled</td>
<td>1</td>
</tr>
<tr>
<td><strong>Total</strong></td>
<td><strong>193</strong></td>
</tr>
</tbody>
</table>

CMA intends to outsource to qualified diverse vendors and suppliers the following services:

- Accounting
- Advertising
- Social media
- Building maintenance
- Janitorial
- Construction
- Environmental planning
- Exterior concrete, masonry and repair
- GIS
- HR
- IT
- Insurance
- Landscaping
- Legal services
We have as our highest priority partnering with diverse businesses and are contracting for the following services.

**Table 3.3**

Contracts with Diverse Groups and Expected Percentage and Dollar Amount: All Operations

<table>
<thead>
<tr>
<th>Diverse Firm</th>
<th>Service</th>
<th>Type</th>
<th>PA Certification</th>
<th>Annual Spend</th>
<th>Percent of Outsourcing</th>
</tr>
</thead>
<tbody>
<tr>
<td>Christopher Lee Haigh</td>
<td>Locksmith</td>
<td>MBE</td>
<td>YES</td>
<td>9,500</td>
<td>1.4</td>
</tr>
<tr>
<td>Acuta Digital, Inc</td>
<td>GIS</td>
<td>MBE</td>
<td>YES</td>
<td>3,500</td>
<td>0.5</td>
</tr>
<tr>
<td>G &amp; R Supply and Service</td>
<td>Building Maintenance</td>
<td>WOMAN</td>
<td>NO</td>
<td>74,000</td>
<td>10.6</td>
</tr>
<tr>
<td>G &amp; R Supply and Service</td>
<td>Cleaning, Janitorial</td>
<td>WOMAN</td>
<td>NO</td>
<td>62,000</td>
<td>8.9</td>
</tr>
<tr>
<td>ERP Consulting Services</td>
<td>Information Technology</td>
<td>WOMAN</td>
<td>NO</td>
<td>120,000</td>
<td>17.2</td>
</tr>
<tr>
<td>RJR Safety</td>
<td>Envir. Impact Assess.</td>
<td>VETERAN</td>
<td>YES</td>
<td>1,500</td>
<td>0.2</td>
</tr>
<tr>
<td>Company</td>
<td>Category</td>
<td>Diversity Status</td>
<td>Gender</td>
<td>Amount</td>
<td>Percentage</td>
</tr>
<tr>
<td>----------------------------------------------</td>
<td>-------------------------------</td>
<td>------------------</td>
<td>--------</td>
<td>---------</td>
<td>------------</td>
</tr>
<tr>
<td>Hoffman Murtaugh Advertising, Inc.</td>
<td>Media Placement</td>
<td>WOMAN</td>
<td>YES</td>
<td>25,000</td>
<td>3.6</td>
</tr>
<tr>
<td>Security</td>
<td>Security Guard Services</td>
<td>VETERAN</td>
<td>NO</td>
<td>300,000</td>
<td>43.0</td>
</tr>
<tr>
<td>Life-Long Lessons, Inc.</td>
<td>Training</td>
<td>MIN-WOMAN</td>
<td>YES</td>
<td>24,000</td>
<td>3.4</td>
</tr>
<tr>
<td>T N Walker, Inc.</td>
<td>Construction Site Clean-up</td>
<td>MBE</td>
<td>YES</td>
<td>5,000</td>
<td>0.7</td>
</tr>
<tr>
<td>Rogers Insurance Group</td>
<td>Insurance</td>
<td>WOMAN</td>
<td>YES</td>
<td>11,800</td>
<td>1.7</td>
</tr>
<tr>
<td>McGee Maruca Assoc. P.C.</td>
<td>Accounting</td>
<td>WOMAN</td>
<td>YES</td>
<td>24,000</td>
<td>3.4</td>
</tr>
<tr>
<td>Mindful Kreative, Inc.</td>
<td>Blogging, Social Media, Internet Adv.</td>
<td>WOMAN</td>
<td>YES</td>
<td>17,000</td>
<td>2.4</td>
</tr>
<tr>
<td>Rae-Lyn Enterprise, Inc.</td>
<td>Signage</td>
<td>WOMAN</td>
<td>YES</td>
<td>8,400</td>
<td>1.2</td>
</tr>
<tr>
<td>MJ Freeway</td>
<td>Seed to Sale Tracking</td>
<td>WOMAN</td>
<td>NO</td>
<td>12,000</td>
<td>1.7</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td></td>
<td>TOTAL</td>
<td>697,700</td>
</tr>
</tbody>
</table>

Our total diversity spend in proportion to total revenues is 28% in year 1 of full operations, 18% in year 2, and 16% in year 3—assuming no increase in vendor prices, and no additional vendors added during the first three years of operation by CMA. Our Community Outreach & Diversity Inclusion Board (defined below) is charged with increasing our diversity vendor spending to achieve our stated goal of 20% of revenues. Although we expect diverse vendors to raise prices during that timeframe our objective is to increase diverse vendor participation to keep total diverse vendor spending above 20%.
COMMUNITY OUTREACH & ENGAGEMENT

Our success in creating a diverse, profitable, and sustainable medical marijuana company hinges on community engagement and outreach. A high priority for CMA is to have an active Community Outreach and Diversity Inclusion committee in place prior to securing a permit. This committee is charged with providing information monthly events with progress toward developing significant relationships within the communities in which CMA operates.

Table 3.4
Community Outreach & Diversity Inclusion Board

<table>
<thead>
<tr>
<th>Community Outreach Members</th>
<th>Position</th>
<th>Area of Focus</th>
</tr>
</thead>
<tbody>
<tr>
<td>Amy Dannemiller</td>
<td>Chair</td>
<td>Women organizations</td>
</tr>
<tr>
<td>Tip Paul</td>
<td>Member</td>
<td>African American &amp; urban organizations and communities; corporate relations</td>
</tr>
<tr>
<td>Chuck Knoll</td>
<td>Member</td>
<td>Union &amp; Elderly organizations and communities</td>
</tr>
<tr>
<td>Lalit Chordia</td>
<td>Member</td>
<td>Asian organizations and communities</td>
</tr>
<tr>
<td>Patricia Ahumada</td>
<td>Member</td>
<td>Hispanic and Latino organizations and communities</td>
</tr>
<tr>
<td>Barry Budd</td>
<td>Member</td>
<td>Veteran’s organizations and communities</td>
</tr>
<tr>
<td>Heather Broman</td>
<td>Member</td>
<td>LGBT organizations and communities</td>
</tr>
<tr>
<td>Grace Chu</td>
<td>Member</td>
<td>Asian organizations and communities</td>
</tr>
</tbody>
</table>

In addition to creating a Community Outreach & Diversity Inclusion Board, we have contacted multiple organizations within the Southwestern Pennsylvania region to identify interested diverse persons to join our Board. We are seeking suitable vendors, interested potential employees, and we are partnering with diverse organizations to present CMA at job fairs.
<table>
<thead>
<tr>
<th>Organization</th>
<th>Contact/ Location</th>
<th>Title</th>
<th>Phone/Email</th>
</tr>
</thead>
<tbody>
<tr>
<td>NAACP Pittsburgh</td>
<td>Connie Parker</td>
<td>President</td>
<td></td>
</tr>
<tr>
<td>Pittsburgh Metropolitan Area Hispanic Chamber of Commerce</td>
<td>Ron Alvarado</td>
<td>Chair</td>
<td></td>
</tr>
<tr>
<td>National Organization of Women</td>
<td>Pittsburgh (East End)</td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td>Westmoreland Co.</td>
<td></td>
<td></td>
</tr>
<tr>
<td>PA Careerlink</td>
<td>Pittsburgh / Allegheny</td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td>Goodwill Industries</td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td>Allegheny East</td>
<td></td>
<td></td>
</tr>
<tr>
<td>African American Chamber of Commerce of Western Pennsylvania</td>
<td>Doris Carson Williams</td>
<td>President &amp; CE</td>
<td></td>
</tr>
<tr>
<td>Urban League of Greater Pittsburgh</td>
<td>Esther L. Bush</td>
<td>President</td>
<td></td>
</tr>
<tr>
<td>Recruit Military</td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>
Beyond direct contact with diverse organizations, we intend to present CMA employment opportunities to diverse groups within the broader Pittsburgh MSA, through social media, radio, and print. We have budgeted $25,000 as an initial investment to seek media placement in newspapers, radio, and social media outlets that have as their primary target audience people from diverse communities.

We intend to advertise in *The Pittsburgh Courier* (African American audience), *The Northside Chronicle* (African American audience), *La Jornada Latina* (Hispanic audience), and with radio station WAMO 100 (African American audience) to reach diverse persons.

We believe our proactive approach to contracting with diverse organizations, our steps to develop relationships with diverse organizations, and our media efforts to engage diverse people will result in significant interest for potential vendors, suppliers, and employees to work with and for CMA.

**RECRUITMENT AND EMPLOYMENT**

CMA is committed to recruiting, developing, and retaining the best talent regardless of age, sex, culture, race, ethnicity religion, color, disability, national origin, ancestry, sexual orientation, and veteran status. We strive to create a diverse work environment that fully capitalizes on the abilities, skills, and potential of our team members and to foster and nurture a collaborative and cooperative workplace environment in which all team members are treated with respect and dignity.

CMA applies the following guidelines in developing and executing action-oriented diversity programs. *Job Descriptions*
We conduct a detailed analysis of job descriptions to ensure that they accurately reflect the essential functions of the job.

We develop worker specifications using essential criteria and include job requirements such as education, experience, and skill requirements for all job openings, distributed to referral sources.

**Hiring-Selection**

- We evaluate our selection process to ensure that it is free from bias, and we train and require personnel involved with recruiting, screening, promotion, and discipline to demonstrate good-faith efforts to remove identified barriers.
- We audit selection procedures periodically to ensure that EEO UNIFORM GUIDELINES are followed and do not adversely impact diverse groups.
- We monitor how applicants are referred to managers for hiring consideration to ensure that our processes are non-discriminatory.

**Compensation Systems**

We review starting wages quarterly to determine if there may be race, color, religion, gender, sexual orientation, age, national origin, ancestry, veteran status, or other non-job-related disability disparities. Where such disparities cannot be explained in terms of performance, length of service or other lawful factors, corrective action will be taken.

**Recruitment Efforts**

Our recruitment efforts are designed to maintain a flow of qualified diverse applicants and includes the following steps.

- Develop relationships with minority, women’s, and veteran’s organizations, and organizations concerned with persons with disabilities for referral applicants. (See Table 3.4 for a listing.)
- Provide briefings to representatives from recruitment sources concerning current and future job openings.
- Encourage employees from diverse groups to refer applicants for employment.
- Participate in career day programs and encouraging our diverse employees to participate whenever possible.
- Establish recruitment efforts at schools, and institutions with special programs that reach diverse people.
- Develop relationships with community child care, housing, transportation, and other programs designed to improve employment opportunities for diverse persons.
- Ensure that job openings are sent to community partners.
- Utilize Zip Recruiter to reach over 100 online career and job websites, as well as social media.

**Promotions**

- Ensure that all employees are given equal opportunities for promotion by communicating promotional opportunities, initiating training programs, and providing clearly defined job descriptions.

**Career Counseling**

- Monitor career counseling to ensure that all employees receive equal opportunity for career counseling.
- Upon request, counsel employees on advancement opportunities and training programs to assist them in professional development.
- Instruct managers and supervisors to refer employees seeking Career Counseling to HR.
· United Food & Commercial Workers Union (UFCW) offers mentor and apprentice programs.

*Training, Promotion, and Retention*
We will provide all employees with equal opportunity to obtain training by:
· Announcing training opportunities.
· Developing training programs that enhance advancement potential.
· Coordinate training programs for workforce development.
· Post promotional opportunities internally in high-traffic areas.
· Monitor retention rates quarterly and compare to previous quarter’s rate.

*Union Representation*
CMA has signed a Neutrality and Card Check Agreement with United Food and Commercial Workers International (UFCW) to ensure the quality of employment for our employees. Working women, Latinos and African Americans benefit greatly from union membership. This is because collective bargaining emphasizes equal pay and fair treatment in the workplace. The Bureau of Labor Statistics has found that women, African Americans and Latinos earn more money on average when they are part of a union. Higher union wages help women, African American and Latino workers raise living standards for the entire community. Unions also help these groups of workers to remedy discrimination on the job, because a union contract provides the means to resolve grievances and seek equal treatment. UFCW also offers protections for LGBT workers in collective bargaining agreements.

*Fair Treatment Policy*
CMA’s Fair Treatment Policy establishes procedures for employees with the opportunity to raise complaints, report problems, and openly discuss matters concerning employment to management. Managers are expected to treat all employees in a respectful manner and provide an environment where growth and development can be achieved by all employees. Our Fair Treatment Policy helps CMA to achieve its goal of collaboration, where each employee receives respect and equal opportunities, regardless of individual characteristics. We proactively ensure competitive pay and benefits, health insurance, paid time off, and train employees to match opportunities to skills. We actively seek the opinions of employees and approach issues and problems from different perspectives.
To maintain a culture of honest and open communication we subscribe to the following:
· We believe we can solve issue together.
· We take pride in our approach and encourage employees to use our Open-Door Policy for concerns or suggestions, and to reach out to management and HR as they see fit.
· We firmly believe that direct, open, and honest communication are the cornerstones of a mutually beneficial employee-management relationship.
· It is the responsibility of management to ensure that CMA’s Fair Treatment Policy is implemented throughout the company.

*Open-Door Policy*
CMA practices an Open-Door Policy which provides timely resolution to employee problems, misunderstandings, and complaints while allowing sufficient time for fact finding and clarifications. No employee will be reprimanded, harassed, or retaliated against for using the Open-Door Policy. Employees are strongly encouraged to address concerns with their supervisor first; but if employees believe that conversation will not be productive, or if they have attempted to address a concern
directly and the situation remains unresolved, they are urged to contact any member of management, HR, the Director of Diversity & Inclusion, or the Chief Executive Officer. Under no circumstances will an employee be penalized or retaliated against for presenting a good-faith complaint to their supervisor or to members of management.

**Anti-Harassment Policy and Procedure**

CMA is committed to providing a workplace free from all forms of harassment, intimidation, or retaliation, in accordance to federal, state, and local laws regarding harassment. As part of CMA’s commitment to comply with all EEO laws, we prohibit harassment on the basis of sex (with or without sexual conduct), race, color, religious creed, national origin, age, citizenship, pregnancy, childbirth or related medical condition, physical or mental disability, sexual orientation, service in the uniformed armed forces, genetic information, or other characteristic covered by applicable state or local EEO Law.

Harassment may take many forms, including the following:

- Verbal conduct such as epithets, derogatory comments, slurs, or unwanted comments, jokes.
- Visual conduct such as derogatory posters, drawings, or gestures.
- Physical conduct such as assault, blocking normal movement, restraint, touching, or other physical interference.
- Threats, demands to submit to certain non-work related conduct, or perform certain non-work related actions to keep a job, avoid some other loss, as a condition of job, benefits, or security.
- Sexual harassment includes unwelcomed sexual advances, requests for sexual favors, and other verbal or physical conduct of a sexual nature.
  - Submission to such conduct is either explicitly or implicitly a term or condition of employment;
  - Submission to or reflection of some conduct by an individual is used as basis for employment decisions affecting the individual;
  - Such conduct has purpose or effect of unreasonably interfering with individual’s work performance; or
  - Such conduct has purpose of effect of creating ab intimidating, hostile, or offensive working environment.

Verbal, physical, or sexual harassment can occur between individuals, employees, and or vendors of CMA. Sexual harassment is unacceptable in the workplace itself and at other work-related functions such as business trips and business-related social events on and off property.

Discrimination or harassment will not be tolerated by employees, supervisors, managers, or non-employees who conduct business with the company. All Company employees are responsible to help ensure that we avoid all types of harassment. Any company employee who believes he/she is the subject of harassment or discrimination on the bases outlined above, or has observed harassment or discrimination, or believes he/she has observed harassment or discrimination, should immediately contact, verbally or in writing, his/her supervisor, manager, HR, or the CEO.

Every effort will be taken to ensure prompt and thorough investigation of any allegation in a confidential manner. Any employee who learns of a complaint or investigation (or who is interviewed as part of an investigation) and knowingly communicates false or misleading information (or who interferes with or undermines an investigation), will be subject to discipline.

No manager is authorized to “do nothing” or to keep confidential from HR any complaint, report, or concern regarding possible discrimination or harassment. He or she must promptly contact HR.
Where a hostile work environment has been found to exist, CMA will take all reasonable steps to eliminate the conduct creating such an environment. If an investigation reveals that the complainant falsely accused another of harassment knowingly or in a malicious manner, the complainant will be subject to disciplinary action, up to and including termination. CMA will not tolerate retaliation against any employee for raising, in good faith, a complaint or concern about discrimination or harassment; for opposing conduct or practice such employee believes to be discrimination or harassment; for assisting another employee to report harassment or discrimination; or filing a good faith complaint or discrimination or harassment with a government agency.

Communication and Dissemination of all Diversity and Code of Conduct Practices
Awareness of the Diversity Plan goals and the Company’s efforts to create an open culture with zero tolerance for discrimination, harassment, or retaliation, is crucial to our success. Management, staff, associates, vendors, contractors, and the general public all benefit from being informed of the Diversity Plan objectives and procedures. Dissemination of information of the Diversity Plan includes the following:

- Internal Communications
  - Inclusion of our zero-tolerance policies for harassment, discrimination, bullying, and other actions which oppose our goal for a diverse workforce;
  - Postings in suitable areas for employee communication;
  - Diversity training programs for all employees;
  - Quarterly progress evaluation meetings with personnel;
  - Formal presentations made to management and employees on diversity initiatives.

- External Communications
  - Advertising in employment and business sections of appropriate types of media;
  - Participating in employment and business notification programs of the DOH;
  - Distribution of literature to organizations actively supportive of minorities, women, disabled persons, and veterans.

DIVERSITY AWARENESS TRAINING PROGRAM

CMA’s diversity awareness training emphasizes the zero-tolerance commitment of CMA’s leadership of harassment and discrimination—in any form—and our strict adherence to take corrective action should any issues, concerns, or complaints arise. All CMA employees are required to complete the diversity awareness training program during employee orientation.

EEO OFFICER MANAGERIAL RESPONSIBILITIES

Our EEO Officer has the full support of the CEO and other managers in carrying out diversity initiatives and has the following responsibilities.

- Develop policy statements and internal and external communication of those policies.
• Develop lawful action-oriented programs that seek to remove identified barriers to minority, female, disabled, and veteran employment and expand employment opportunities for all people with diverse backgrounds.
• Measure the effectiveness of diversity programs.
• Design and implement audit systems.
• Serve as liaison with enforcement agencies.
• Serve as liaison with diverse groups.
• Keep management informed of the latest developments in the entire equal opportunity area.
• Provide career counseling for employees.
• Make sure that posters are properly displayed.
• Ensure that all facilities are available on a non-discriminatory basis.
• Maintain the prior years’ diversity plan and all related documents.
• Work with Federal, State, local and county agencies to verify that a business is a least 51 percent minority owned.

INTERNAL AUDIT AND REPORTING
CMA shall submit to the DOH an annual report setting forth the Company’s performance in fulfilling the goals of this Diversity Plan, containing:
• Employment data, including information on minority, women, disabled, and veteran representation in the workforce in all job classifications; average salary ranges; recruitment and training information (all job categories); and retention and outreach efforts.
• The total number and value of all contracts and/or subcontractors awarded for goods and services.
• An identification of each subcontract actually awarded to a member of a diverse group (as defined above) and the actual value of such subcontract.
• A comprehensive description of all efforts made by CMA to monitor and enforce the Diversity Plan.
• Information on diverse group investment, equity ownership, and other ownership or employment opportunities initiated or promoted by CMA.
• Other information deemed necessary or desirable by the DOH to ensure compliance with the rules and regulations governing medical marijuana organizations in Pennsylvania.
# CMA Diversity Status

## Table 3.5

Diversity Status of Principals, Operators, Financial Backers, Employees of CMA

<table>
<thead>
<tr>
<th>Category</th>
<th>Role</th>
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<tbody>
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</tr>
<tr>
<td>Principal, Backer, Operator</td>
<td>Co-CEO</td>
<td>Male, White</td>
</tr>
<tr>
<td>Principal, Operator</td>
<td>COO &amp; Cultivation</td>
<td>Male, White</td>
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<tr>
<td>Principal, Operator</td>
<td>Dir. Processing</td>
<td>Male, Asian</td>
</tr>
<tr>
<td>Principal, Operator</td>
<td>Dir. Security</td>
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<tr>
<td>Principal, Operator</td>
<td>Dir. Compliance</td>
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<td>Principal, Operator</td>
<td>Dir. Diversity &amp; Inclusion</td>
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<td>Principal, Operator</td>
<td>Med. Director</td>
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<td>Principal, Operator</td>
<td>Dir. Dispensaries</td>
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<td>Principal, Operator</td>
<td>Dir. IT</td>
<td>Female, White, LGBT</td>
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<tr>
<td>Principal, Operator</td>
<td>HR Manager</td>
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### Table 3.6
CMA Workforce Utilization Report

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<tr>
<th>Job Category</th>
<th>Total Employed</th>
<th>Total Men</th>
<th>Total Women</th>
<th>Total Veteran</th>
<th>Total Service-Disabled Veteran</th>
<th>Total Hispanic</th>
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### Part C - Applicant Background Information

*(Scoring Method: Pass/Fail)*

For this part the applicant is required to provide background and contact information for the principals, financial backers, operators and employees.

### Section 4 – Principals, Financial Backers, Operators and Employees

#### A. Please list Principals, Financial Backers and Operators

<table>
<thead>
<tr>
<th>Name and Residential Address</th>
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</thead>
<tbody>
<tr>
<td><strong>First Name:</strong> Theodore</td>
</tr>
<tr>
<td><strong>Occupation:</strong> Owner/President</td>
</tr>
<tr>
<td><strong>Also known as:</strong> Tip Paul; T. Hays Paul</td>
</tr>
<tr>
<td><strong>Address Line 1:</strong> <strong>REDACTED</strong></td>
</tr>
<tr>
<td><strong>Address Line 3:</strong> N/A</td>
</tr>
<tr>
<td><strong>Phone</strong></td>
</tr>
</tbody>
</table>

### Name and Residential Address

<p>| <strong>First Name:</strong> Charles    | <strong>Middle Name:</strong> Albert     | <strong>Last Name:</strong> Knoll        | <strong>Suffix:</strong> Jr., Esq.       |
| <strong>Occupation:</strong> Attorney   | <strong>Title in the applicant’s business:</strong> Co-CEO |
| <strong>Also known as:</strong> N/A     | <strong>Date of birth:</strong> <strong>REDACTED</strong> |
| <strong>Address Line 1:</strong> <strong>REDACTED</strong> | <strong>Address Line 2:</strong> N/A |</p>
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**Name and Residential Address**

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<tr>
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<th>David</th>
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<th>Budd</th>
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**Name and Residential Address**

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**Name and Residential Address**

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**Name and Residential Address**

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<tr>
<th>First Name:</th>
<th>Lucas</th>
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**Name and Residential Address**

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<tr>
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B. Please list Employees

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

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<thead>
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<th>Name and Residential Address</th>
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<tr>
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<td>Middle Name:</td>
<td>Last Name:</td>
<td>Suffix:</td>
</tr>
<tr>
<td>Occupation:</td>
<td>Title in the applicant’s business:</td>
<td></td>
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<tr>
<td>Also known as:</td>
<td>Date of birth: MM/DD/YYYY</td>
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<tr>
<td>Address Line 1:</td>
<td>Address Line 2:</td>
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<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>

<table>
<thead>
<tr>
<th>Name and Residential Address</th>
<th></th>
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</thead>
<tbody>
<tr>
<td>First Name:</td>
<td>Middle Name:</td>
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<td>Fax:</td>
<td>Email:</td>
<td></td>
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</tbody>
</table>
Pennsylvania Department of Health
Medical Marijuana Grower/Processor Permit Application

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

Section 5 – Moral Affirmation
By checking "Yes," you affirm that each principal, financial backer, operator and employee listed in this permit application is of good moral character.

Section 6 – Compliance with Applicable Laws and Regulations
By checking "Yes," you affirm that you, as well as the principals, financial backers, operators and employees listed in this permit application are able to continuously comply with all applicable Commonwealth laws and regulations relating to the operation of a medical marijuana grower/processor facility.

Section 7 – Civil and Administrative Action
For the statements below:
- By checking "Yes," you affirm the statement
- If you check "No," you must state your reasoning in "Schedule A" below

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

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>Submit Grower/Processor Application to the Department of Health. Starting capital $5,000,000 placed into business.</td>
<td>3/20/2017</td>
</tr>
<tr>
<td>Request and review bids for construction.</td>
<td>4/1/2017</td>
</tr>
<tr>
<td>Continue facility improvements including cleaning, replacing ceilings, and installing new flooring.</td>
<td>4/15/2017</td>
</tr>
</tbody>
</table>
Permit awarded. 5/1/2017

Apply for a building permit with the Building Department 5/2/2017

Obtain final bids for construction vendors and award job. 5/2/2017

Secure local approval to begin construction including building permit (certificate of occupancy already obtained) 5/15/2017

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

Section 9 – Employee Qualifications, Description of Duties and Training

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

1. Chuck Knoll, Co-Chief Executive Officer: Works in partnership with Tip Paul, Co-CEO, and provides leadership in achieving CMA’s vision, mission, strategy, and annual goals. The CEO oversees the operation of all locations, managers, and employees. The CEO provides general oversight of all CMA activities and assures a smoothly functioning, efficient organization. The CEO oversees program quality and organizational stability through development and implementation of standards and controls, systems and procedures, and regular evaluation. The CEO maintains a work environment that recruits, retains and supports quality staff and a process for selecting, development, motivating and evaluating staff. The CEO works with the CFO to promote programs and services that are produced in a cost-effective manner, employing economy while maintaining a high level of quality. Provides both operational and programmatic support to the organization. Acts as the financial spokesperson for CMA. Directly assists the Chief Operating Officer on all strategic and tactical matters as they relate to budget management, cost benefit analysis, forecasting needs, and the securing of new funding.

2. Tip Paul, Co-Chief Executive Officer: Works in partnership with Chuck Knoll, Co-CEO, and provides leadership in achieving CMA’s vision, mission, strategy, and annual goals. The CEO oversees the operation of all locations, managers, and employees. The CEO provides general oversight of all CMA activities and assures a smoothly functioning, efficient organization. The CEO oversees program quality and organizational stability through development and implementation of standards and controls, systems and procedures, and regular evaluation. The CEO maintains a work environment that recruits, retains and supports quality staff and a process for selecting, development, motivating and evaluating staff. The CEO works with the CFO to promote programs and services that are produced in a cost-effective manner, employing economy while maintaining a high level of quality. Provides both operational and programmatic support to the organization. Acts as the financial spokesperson for CMA. Directly assists the Chief Operating Officer on all
strategic and tactical matters as they relate to budget management, cost benefit analysis, forecasting needs, and the securing of new funding.

| 3. Barry Budd, Director of Security: | DOH REDACTED |

| 4. Morgan Carr, Chief Operating Officer: Responsible for day-to-day operations and the development, design, operation, and improvement of the systems that create and deliver CMA’s medical marijuana products to ensure quality and compliance in all operations, including safety and security. Supervises the Director of Quality Assurance, Director of Cultivation, Director of Facilities, and Director of Security. The COO coordinates the internal operational activities of CMA in accordance with policies, goals, and objectives. The COO participates in key decisions and assists the CEO in developing short and long-term organizational goals, objectives and strategic initiatives. Responsible for forecasting future CMA sales and developing approved sales plans and strategies. |

| 5. Dr. Thomas Krivak, MD., Medical Director: The Medical Director is primarily involved with Dispensary operations, however, in the Grower/Processor operation, the Medical Director may consult with the COO to recommend product developments based on feedback from our patients. |

| 6. Amy Dannemiller, Director of Diversity & Inclusion: The Director of Diversity & Inclusion will implement, maintain, and direct CMA’s diversity goals by ensuring each employee is an integral part of its success and the company follows the principles of diversity and equal opportunity. The Director of Diversity & Inclusion will chair the Diversity Committee who is responsible for advancing the diversity and inclusion strategy by setting strategic direction and managing all aspects of the strategy. They will strive to achieve CMA’s diversity goals by developing talent at all levels of the company that exceeds the cultural and ethnic diversity characteristics of the region, supporting the local economy through purchasing goods and services from a diversified group of vendors, contractors and professional service providers, conducting outreach efforts to patients across the region that embraces all ethnicities, increasing cooperation, collaboration, and team-building among employees, and enhancing the communities in which we operate. |
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7. Luke Paul, Director of Facilities: Oversees the functioning of building systems including mechanical, electrical, fire and life safety, and elevators (if applicable). Oversees all contractors doing repairs or Facility renovation projects. Supervises tradespeople who install and repair HVAC systems in the Facility. Maintains all HVAC systems, including testing electrical circuits, wire components, and electrical equipment ensuring compliance with all regulations. Oversees the maintenance of grounds, building(s), and equipment. Maintains all maintenance and sanitation records and ensures all activities are in accordance with standard operating procedures, manufacturer’s’ instructions, and all applicable state and local laws, regulations, ordinances, and other requirements.

8. Dr. Lalit Chordia - Director of Processing: Responsible for supervising all phases of CMA’s processing operations including: regulatory compliance, all phases of production of marijuana products, quality assurance, inventory control, purchasing, and shipping and receiving. Supervises the extraction and preparation of medical marijuana products. Works closely with the Quality Assurance department. Monitors sanitation practices and ensure that kitchen safety standards are followed. Oversees all processing staff.

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

1. Chuck Knoll, Co-Chief Executive Officer: Mr. Knoll himself has decades of experience in community law and a deep commitment to public service. Since graduating from Duquesne University School of Law, Mr. Knoll has been a solicitor with Bethel Park Zoning, Braddach Hills Zoning, Bourough of Homestead Zoning, and with the West Deer Township County. He also served in Allegheny County as Clerk of Courts, County Controller, and in the District Attorney Office. Mr. Knoll is active in the Boys and Girls Club of America, and has served on the board of directors of the University of Pittsburgh, as well as on the Alumni Leadership Council. Mr. Knoll also has a degree from the University of Pittsburgh in Business Administration. Mr. Knoll is more than qualified to serve as CMA’s Co-Chief Executive Officer.

2. Tip Paul, Co-Chief Executive Officer: Mr. Paul has extensive experience in running manufacturing businesses. In some ways, running a medical marijuana cultivation and processing operation is like running any other manufacturing business. Mr. Paul has demonstrated the ability to run a successful manufacturing operation as president and owner of P.E.I. Pittsburgh, a leading manufacturer, converter, and distributor of world-class electrical insulation materials. Under Mr. Paul’s leadership, P.E.I. has grown from two employees in 1995 to nearly 50 employees in 2017 and has expanded from one office in Pittsburgh to offices in Texas, Chile, and China. In addition to unique, customer-specific solutions, P.E.I. has developed industry-leading logistics and shipping and is able to meet market demand in national and international markets. The knowledge Mr. Paul has acquired in this area will serve CMA well as it manages logistics within the Commonwealth. Mr. Paul is extremely qualified to serve as Co-Chief Executive Officer of CMA.

3. Barry Budd, Director of Security: Mr. Budd has had a distinguished career involving many aspects of law enforcement, public safety, high-level security, and collaborating with federal,
state, and local agencies across a variety of public domains. Mr. Budd is currently (1989-present) a Sergeant with the Pittsburgh Bureau of Police (BPB) where he leads criminal intelligence, criminal analysis, and dignitary protective services. He is Supervisor of the BPB dive team, a S.W.A.T. team operator, a HAZMAT technician, and Flood Response Leader and Trainer. Mr. Budd works closely with the Pennsylvania State Police, FBI, Department of Homeland Security, ATF, Secret Service, and with universities, schools, and business groups. Prior to his role as Sergeant, Mr. Budd was a uniformed police officer, K-9 handler, narcotics detective, DEA federally deputized task force officer, trained sniper, and a warrant officer with S.E.A.L. Team 18. He was deployed to Iraq in 2004 and again in 2009. Mr. Budd has the law enforcement, training, and security qualifications to serve as CMA’s Director of Security.

4. **Morgan Carr, Chief Operating Officer**: Mr. Carr has been a leader and innovator in the state-regulated medical marijuana industry since Colorado adopted medical marijuana regulations in 2010. He is the founder and president of MMST, LLC (DBA Wellspring Collective), a vertically integrated business with both cultivation and dispensary operations in Denver, Colorado. He has been operating Wellspring since 2009 and has expanded to provide medical marijuana services in Nevada. Mr. Carr’s operating procedures are best-in-class and formed the basis for the Denver Department of Environmental Health’s 2010 “Best Management Practices: Commercial Medical Marijuana Cultivation Operation” manual. Mr. Carr is well respected within the marijuana industry and is sought out by regulators for insight and advice on regulatory issues. As a long time medical marijuana business operator, Mr. Carr is supremely qualified to serve as CMA’s Chief Operating Officer.

5. **Dr. Thomas Krivak, MD., Medical Director**: Dr. Krivak has been a board certified practitioner in Pennsylvania and West Virginia for fifteen years and he is a recognized expert in the field of gynecologic oncology. Dr. Krivak has authored or co-authored 95 referred articles, written 52 book chapters, reviews, symposia or other proceedings, presented 71 conference papers, and has been awarded over $1.2 million in research grants. Dr. Krivak sees great potential in medical marijuana as a complementary therapy for patients with cancer and other conditions. In addition to providing oversight for CMA’s medical marijuana program, Dr. Krivak seeks to work closely with hospitals, health providers, and others in the medical field to educate them on the potential application of marijuana to multiple conditions and to develop potential research partners to investigate the efficacy of marijuana for various serious health conditions. As an accomplished physician, Dr. Krivak has the necessary qualifications to serve as CMA’s Medical Director.

6. **Amy Dannemiller, Director of Diversity & Inclusion**: Mrs. Dannemiller is more commonly known by her brand name of ‘Jane West’. She is the founder and chairwoman on the Board of Women Grow, an organization created to connect, educate, inspire, and empower the next generation of marijuana leaders by creating programs, community and events for aspiring and current business executives. Founded in 2014, Women Grow serves as a catalyst for women to influence and succeed in the marijuana industry. She is also the CEO and founder of JaneWest.com, an authentic lifestyle brand featuring reviews of the best products on the market while educating new consumers. Mrs. Dannemiller has previously served as senior events manager, director of operations, and domestic outreach manager for multiple companies and campaigns. She has a Master’s Degree in Social Work and Community Outreach Specialization from Denver University.
Mrs. Dannemiller is known as a preeminent figure in the marijuana industry, especially bringing thousands of women together. With this experience, Mrs. Dannemiller has the necessary qualifications to serve as Director of Diversity & Inclusion.

7. Luke Paul, Director of Facilities: Mr. Paul has over 20 years of experience supervising production processes and operations in P.E.I. He has served as general manager for P.E.I. and is responsible for maintaining compliance with all safety, quality and environmental standards at the facility. Mr. Paul previously was a partner and operations manager of Loud Performance Products and an owner and manager at Nevada Ltd. At Nevada Ltd, Mr. Paul cultivated relationships with tenants, managed lease details with the Bureau of Land Management in Nevada, and facilitated major building renovations of office space. Mr. Paul has the qualifications and experience to serve as CMA’s Director of Facilities.

8. Dr. Lalit Chordia, Director of Processing: Dr. Chordia is an internationally-recognized expert in capillary supercritical chromatographic technology and was the first person in the world to apply this technology to extraction for pharmaceuticals and medicines. Dr. Chordia is the sole author or twelve issued U.S. patents and has an additional seventeen patents pending. In 1990 Dr. Chordia founded Pittsburgh-based Thar, a novel technology company that applies supercritical fluid research to create equipment and processes for a wide range of seemingly intractable problems. Dr. Chordia received his bachelor’s degree in chemical engineering from the Indian Institute of Technology (Madras, India), and his Ph.D. in chemical engineering from Carnegie Mellon University (Pittsburgh). With his extensive experience in processing and extraction, Dr. Chordia has the qualifications to serve as CMA’s Director of Processing.

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. Chuck Knoll, Co-Chief Executive Officer: CMA will ensure all employees have the education, training, and experience, or any combination thereof, to enable the employee to perform all assigned functions. The 2 hour training course developed by the Department must be completed prior to starting initial operation of a facility. The Co-Chief Executive Officer must receive at least twelve (12) hours of ongoing training annually or more often as necessary to maintain compliant, safe, and productive operations, including the two-hour training course developed by the Department. The Co-Chief Executive Officer must complete the two-hour training course developed by the Department within the times specified prior to commencing initial operation of the facility. Mr. Knoll has successfully completed a Continuing Legal Education course about getting started in the medical marijuana business in Pennsylvania from the Pennsylvania Bar Institute.

Training will include, at a minimum, the following:
- The provisions of the act and this part relevant to the responsibilities of principals and
employees of grower/processors.
- Proper handling of medical marijuana.
- Proper recordkeeping.
- How to prevent and detect the diversion of medical marijuana.
- Best practice security procedures.
- Best practice safety procedures, including responding to the following:
  - A medical emergency.
  - A fire.
  - A chemical spill.
  - A threatening event including:
    - An armed robbery.
    - A burglary.
    - A criminal incident.
- CMA’s Employee Handbook.
- Commonwealth of Pennsylvania’s Workers’ Compensation system and benefits.
- HIPAA, ADA, EEOC, and other federal, state, and local laws, regulations, ordinances, and other requirements related to general business and the medical marijuana industry.
- The quality assurance duties of each employee related to CMA operations.
- Inventory management system and other IT and communications software and hardware information.
- Instructions regarding regulatory inspection preparedness and law enforcement interactions.
- Workplace safety training.
- Hazard communication training.

CMA will maintain records of any training received and attendance records by the Co-Chief Executive Officer. Each record of required training will include, at a minimum:
- Co-Chief Executive Officer’s name and identification badge number.
- Signed statement from the Co-Chief Executive Officer indicating the date, time, and place of training.
- Topics covered in training.
- Name and title of presenter(s).
- Certificate of attendance indicating satisfactory completion of training signed by presenter(s).

The Human Resources Manager will maintain all CMA training records and logs in each employee’s personnel file. All training documentation and personnel files will be made available for inspection by the Department and its authorized agents, upon request.
2. Tip Paul, Co-Chief Executive Officer: CMA will ensure all employees have the education, training, and experience, or any combination thereof, to enable the employee to perform all assigned functions. The 2 hour training course developed by the Department must be completed prior to starting initial operation of a facility. The Co-Chief Executive Officer must receive at least twelve (12) hours of ongoing training annually or more often as necessary to maintain compliant, safe, and productive operations, including the two-hour training course developed by the Department. The Co-Chief Executive Officer must complete the two-hour training course developed by the Department within the times specified prior to commencing initial operation of the facility.

Training will include, at a minimum, the following:
- The provisions of the act and this part relevant to the responsibilities of principals and employees of grower/processors.
- Proper handling of medical marijuana.
- Proper recordkeeping.
- How to prevent and detect the diversion of medical marijuana.
- Best practice security procedures.
- Best practice safety procedures, including responding to the following:
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    - A criminal incident.
- CMA’s Employee Handbook.
- Commonwealth of Pennsylvania’s Workers’ Compensation system and benefits.
- HIPAA, ADA, EEOC, and other federal, state, and local laws, regulations, ordinances, and other requirements related to general business and the medical marijuana industry.
- The quality assurance duties of each employee related to CMA operations.
- Inventory management system and other IT and communications software and hardware information.
- Instructions regarding regulatory inspection preparedness and law enforcement interactions.
- Workplace safety training.
- Hazard communication training.

CMA will maintain records of any training received and attendance records by the Co-Chief Executive Officer. Each record of required training will include, at a minimum:
- Co-Chief Executive Officer’s name and identification badge number.
- Signed statement from the Co-Chief Executive Officer indicating the date, time, and place of training.
- Topics covered in training.
- Name and title of presenter(s).
- Certificate of attendance indicating satisfactory completion of training signed by presenter(s).

The Human Resources Manager will maintain all CMA training records and logs in each employee’s personnel file. All training documentation and personnel files will be made available for inspection by the Department and its authorized agents, upon request.

3. Barry Budd, Director of Security: CMA will ensure all employees have the education, training, and experience, or any combination thereof, to enable the employee to perform all assigned functions. The 2 hour training course developed by the Department must be completed prior to starting initial operation of a facility. The Director of Security must receive at least twelve (12) hours of ongoing training annually or more often as necessary to maintain compliant, safe, and productive operations, including the two-hour training course developed by the Department. The Director of Security must complete the two-hour training course developed by the Department within the times specified prior to commencing initial operation of the facility. The Director of Security will also provide ongoing training to all employees in security procedures and any updates to security policies. In his role as a Pittsburgh Police Officer, Barry Budd has extensive experience in training and educating law enforcement in multiple fields including many leadership courses. Barry Budd was the former Training Department Chief for 600 personnel at Fort Belvoir in Virginia, a former Navy Trainer, Command Training Officer, and Firearms Instructor. He also is certified in Pennsylvania Municipal Police Officer Education Training Center as a police instructor.

Training will include, at a minimum, the following:
- The provisions of the act and this part relevant to the responsibilities of principals and employees of grower/processors.
- Proper handling of medical marijuana.
- Proper recordkeeping.
- How to prevent and detect the diversion of medical marijuana.
- Best practice security procedures.
- Best practice safety procedures, including responding to the following:
  - A medical emergency.
  - A fire.
  - A chemical spill.
  - A threatening event including:
    - An armed robbery.
- A burglary.
- A criminal incident.
- CMA’s Employee Handbook.
- Commonwealth of Pennsylvania’s Workers’ Compensation system and benefits.
- HIPAA, ADA, EEOC, and other federal, state, and local laws, regulations, ordinances, and other requirements related to general business and the medical marijuana industry.
- The quality assurance duties of each employee related to CMA operations.
- Inventory management system and other IT and communications software and hardware information.
- Instructions regarding regulatory inspection preparedness and law enforcement interactions.
- Workplace safety training.
- Hazard communication training.

In addition to the above training, the Director of Security must also be required to complete the following training components:
- Employee and visitor access procedures.
- Camera monitoring and safety systems.
- Suspicious behavior and incident identification.
- Incident management and reporting.
- Risk assessment and response.

CMA will maintain records of any training received and attendance records by the Director of Security. Each record of required training will include, at a minimum:
- Director of Security’s name and identification badge number.
- Signed statement from the Director of Security indicating the date, time, and place of training.
- Topics covered in training.
- Name and title of presenter(s).
- Certificate of attendance indicating satisfactory completion of training signed by presenter(s).

The Human Resources Manager will maintain all CMA training records and logs in each employee’s personnel file. All training documentation and personnel files will be made available for inspection by the Department and its authorized agents, upon request.

4. Morgan Carr, Chief Operations Officer: CMA will ensure all employees have the education, training, and experience, or any combination thereof, to enable the employee to perform all assigned functions. The 2 hour training course developed by the Department must be completed prior to starting initial operation of a facility. The Chief Operations Officer must receive at least twelve (12) hours of ongoing training annually or
more often as necessary to maintain compliant, safe, and productive operations, including the two-hour training course developed by the Department. The Chief Operations Officer must complete the two-hour training course developed by the Department within the times specified prior to commencing initial operation of the facility.

Training will include, at a minimum, the following:
- The provisions of the act and this part relevant to the responsibilities of principals and employees of grower/processors.
- Proper handling of medical marijuana.
- Proper recordkeeping.
- How to prevent and detect the diversion of medical marijuana.
- Best practice security procedures.
- Best practice safety procedures, including responding to the following:
  - A medical emergency.
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    - An armed robbery.
    - A burglary.
    - A criminal incident.
- CMA’s Employee Handbook.
- Commonwealth of Pennsylvania’s Workers’ Compensation system and benefits.
- HIPAA, ADA, EEOC, and other federal, state, and local laws, regulations, ordinances, and other requirements related to general business and the medical marijuana industry.
- The quality assurance duties of each employee related to CMA operations.
- Inventory management system and other IT and communications software and hardware information.
- Instructions regarding regulatory inspection preparedness and law enforcement interactions.
- Workplace safety training.
- Hazard communication training.

CMA will maintain records of any training received and attendance records by the Chief Operating Officer. Each record of required training will include, at a minimum:
- Chief Operating Officer’s name and identification badge number.
- Signed statement from the Chief Operating Officer indicating the date, time, and place of training.
- Topics covered in training.
- Name and title of presenter(s).
- Certificate of attendance indicating satisfactory completion of training signed by
presenter(s).

The Human Resources Manager will maintain all CMA training records and logs in each employee’s personnel file. All training documentation and personnel files will be made available for inspection by the Department and its authorized agents, upon request.

5. Dr. Thomas Krivak, MD., Medical Director: CMA will ensure all employees have the education, training, and experience, or any combination thereof, to enable the employee to perform all assigned functions. The 2 hour training course developed by the Department must be completed prior to starting initial operation of a facility. The Medical Director must receive at least twelve (12) hours of ongoing training annually or more often as necessary to maintain compliant, safe, and productive operations, including the two-hour training course developed by the Department. The Medical Director must complete the two-hour training course developed by the Department within the times specified prior to commencing initial operation of the facility.

Training will include, at a minimum, the following:
- The provisions of the act and this part relevant to the responsibilities of principals and employees of grower/processors.
- Proper handling of medical marijuana.
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- How to prevent and detect the diversion of medical marijuana.
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- The quality assurance duties of each employee related to CMA operations.
- Inventory management system and other IT and communications software and hardware information.
- Instructions regarding regulatory inspection preparedness and law enforcement interactions.
- Workplace safety training.
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- Hazard communication training.

CMA will maintain records of any training received and attendance records by the Medical Director. Each record of required training will include, at a minimum:
- Medical Director’s name and identification badge number.
- Signed statement from the Medical Director indicating the date, time, and place of training.
- Topics covered in training.
- Name and title of presenter(s).
- Certificate of attendance indicating satisfactory completion of training signed by presenter(s).

The Human Resources Manager will maintain all CMA training records and logs in each employee’s personnel file. All training documentation and personnel files will be made available for inspection by the Department and its authorized agents, upon request.

6. Amy Dannemiller, Director of Diversity & Inclusion: CMA will ensure all employees have the education, training, and experience, or any combination thereof, to enable the employee to perform all assigned functions. The 2 hour training course developed by the Department must be completed prior to starting initial operation of a facility. The Director of Diversity & Inclusion must receive at least twelve (12) hours of ongoing training annually or more often as necessary to maintain compliant, safe, and productive operations, including the two-hour training course developed by the Department. The Director of Diversity & Inclusion must complete the two-hour training course developed by the Department within the times specified prior to commencing initial operation of the facility.

Training will include, at a minimum, the following:
- The provisions of the act and this part relevant to the responsibilities of principals and employees of grower/processors.
- Proper handling of medical marijuana.
- Proper recordkeeping.
- How to prevent and detect the diversion of medical marijuana.
- Best practice security procedures.
- Best practice safety procedures, including responding to the following:
  - A medical emergency.
  - A fire.
  - A chemical spill.
  - A threatening event including:
    - An armed robbery.
    - A burglary.
- A criminal incident.
- CMA’s Employee Handbook.
- Commonwealth of Pennsylvania’s Workers’ Compensation system and benefits.
- HIPAA, ADA, EEOC, and other federal, state, and local laws, regulations, ordinances, and other requirements related to general business and the medical marijuana industry.
- The quality assurance duties of each employee related to CMA operations.
- Inventory management system and other IT and communications software and hardware information.
- Instructions regarding regulatory inspection preparedness and law enforcement interactions.
- Workplace safety training.
- Hazard communication training.

CMA will maintain records of any training received and attendance records by the Director of Diversity & Inclusion. Each record of required training will include, at a minimum:
- Director of Diversity & Inclusion’s name and identification badge number.
- Signed statement from the Director of Diversity & Inclusion indicating the date, time, and place of training.
- Topics covered in training.
- Name and title of presenter(s).
- Certificate of attendance indicating satisfactory completion of training signed by presenter(s).

The Human Resources Manager will maintain all CMA training records and logs in each employee’s personnel file. All training documentation and personnel files will be made available for inspection by the Department and its authorized agents, upon request.

7. Luke Paul, Director of Facilities: CMA will ensure all employees have the education, training, and experience, or any combination thereof, to enable the employee to perform all assigned functions. The 2 hour training course developed by the Department must be completed prior to starting initial operation of a facility. The Director of Facilities must receive at least twelve (12) hours of ongoing training annually or more often as necessary to maintain compliant, safe, and productive operations, including the two-hour training course developed by the Department. The Director of Facilities must complete the two-hour training course developed by the Department within the times specified prior to commencing initial operation of the facility.

Training will include, at a minimum, the following:
- The provisions of the act and this part relevant to the responsibilities of principals and employees of grower/processors.
- Proper handling of medical marijuana.
- Proper recordkeeping.
- How to prevent and detect the diversion of medical marijuana.
- Best practice security procedures.
- Best practice safety procedures, including responding to the following:
  - A medical emergency.
  - A fire.
  - A chemical spill.
  - A threatening event including:
    - An armed robbery.
    - A burglary.
    - A criminal incident.
- CMA’s Employee Handbook.
- Commonwealth of Pennsylvania’s Workers’ Compensation system and benefits.
- HIPAA, ADA, EEOC, and other federal, state, and local laws, regulations, ordinances, and other requirements related to general business and the medical marijuana industry.
- The quality assurance duties of each employee related to CMA operations.
- Inventory management system and other IT and communications software and hardware information.
- Instructions regarding regulatory inspection preparedness and law enforcement interactions.
- Workplace safety training. Hazard communication training.

In addition to the above training, the Director of Facilities must also be required to complete Personal Protective Equipment (PPE) training, which includes the following training components:
- When PPE is necessary.
- What PPE is necessary.
- How to properly adjust and wear PPE.
- The limitations of PPE.
- The proper care, maintenance, useful life, and disposal of PPE.
- Risk assessment and response.

CMA will maintain records of any training received and attendance records by the Director of Facilities. Each record of required training will include, at a minimum:
- Director of Facilities’ name and identification badge number.
- Signed statement from the Director of Facilities indicating the date, time, and place of training.
- Topics covered in training.
- Name and title of presenter(s).
- Certificate of attendance indicating satisfactory completion of training signed by
presenter(s).

The Human Resources Manager will maintain all CMA training records and logs in each employee’s personnel file. All training documentation and personnel files will be made available for inspection by the Department and its authorized agents, upon request.

8. Dr. Lalit Chordia, Director of Processing: CMA will ensure all employees have the education, training, and experience, or any combination thereof, to enable the employee to perform all assigned functions. The 2 hour training course developed by the Department must be completed prior to starting initial operation of a facility. The Director of Processing must receive at least twelve (12) hours of ongoing training annually or more often as necessary to maintain compliant, safe, and productive operations, including the two-hour training course developed by the Department. The Director of Processing must complete the two-hour training course developed by the Department within the times specified prior to commencing initial operation of the facility.

Training will include, at a minimum, the following:
- The provisions of the act and this part relevant to the responsibilities of principals and employees of grower/processors.
- Proper handling of medical marijuana.
- Proper recordkeeping.
- How to prevent and detect the diversion of medical marijuana.
- Best practice security procedures.
- Best practice safety procedures, including responding to the following:
  - A medical emergency.
  - A fire.
  - A chemical spill.
  - A threatening event including:
    - An armed robbery.
    - A burglary.
    - A criminal incident.
- CMA’s Employee Handbook.
- Commonwealth of Pennsylvania’s Workers’ Compensation system and benefits.
- HIPAA, ADA, EEOC, and other federal, state, and local laws, regulations, ordinances, and other requirements related to general business and the medical marijuana industry.
- The quality assurance duties of each employee related to CMA operations.
- Inventory management system and other IT and communications software and hardware information.
- Instructions regarding regulatory inspection preparedness and law enforcement interactions.
- Workplace safety training.
- Hazard communication training.

CMA will maintain records of any training received and attendance records by the Director of Processing. Each record of required training will include, at a minimum:
- Director of Processing’s name and identification badge number.
- Signed statement from Director of Processing indicating the date, time, and place of training.
- Topics covered in training.
- Name and title of presenter(s).
- Certificate of attendance indicating satisfactory completion of training signed by presenter(s).

The Human Resources Manager will maintain all CMA training records and logs in each employee’s personnel file. All training documentation and personnel files will be made available for inspection by the Department and its authorized agents, upon request.

If more space is required for any of the above three components of Section 9 (A, B and C), please submit additional information in a separate document titled “Employee Qualifications, Description of Duties and Training (Cont’d.)” 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.
### Section 11 – Transportation of Medical Marijuana

<table>
<thead>
<tr>
<th>A. Transportation</th>
<th>Yes</th>
<th>No</th>
</tr>
</thead>
<tbody>
<tr>
<td>By checking “Yes,” you affirm that any delivery of medical marijuana to any other medical marijuana grower/processor facility, dispensary, or approved laboratory within the Commonwealth will adhere to the following:</td>
<td></td>
<td></td>
</tr>
<tr>
<td>If you check “No” to any statement, you must state the reasoning for doing so at the end of this section. If issued a permit, you must be able to affirm each statement by the time the Department determines you to be operational under the Act and regulations.</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>
Pennsylvania Department of Health  
Medical Marijuana Grower/Processor Permit Application

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

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

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

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

### B. Transport Manifest

By checking “Yes” to any statement, you affirm that the transport manifest (printed or 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...
Pennsylvania Department of Health  
Medical Marijuana Grower/Processor Permit Application

reflect the specific medical marijuana in transit; each recipient will also provide the grower/processor with a printed receipt for the medical marijuana received.

- All medical marijuana being transported must be packaged in shipping containers and labeled in accordance with § 1151.34 (relating to packaging and labeling of medical marijuana).

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

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

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

N/A

C. PLEASE DESCRIBE YOUR PLAN REGARDING THE TRANSPORTATION OF MEDICAL MARIJUANA AND MEDICAL MARIJUANA PRODUCTS. FOR EXAMPLE, EXPLAIN WHETHER YOU PLAN TO MAINTAIN YOUR OWN TRANSPORTATION OPERATION AS PART OF THE FACILITY OPERATION, OR WHETHER YOU WILL USE A THIRD-PARTY CONTRACTOR. IF YOU CHOOSE TO USE YOUR OWN TRANSPORTATION OPERATION, PLEASE PROVIDE THE NUMBER AND TYPE OF VEHICLES THAT WILL BE USED TO TRANSPORT MEDICAL MARIJUANA AND MEDICAL MARIJUANA PRODUCTS, THE TRAINING THAT WILL BE PROVIDED TO EMPLOYEES THAT WILL TRANSPORT MEDICAL MARIJUANA AND MEDICAL MARIJUANA PRODUCTS, AND ANY ADDITIONAL MEASURES YOU WILL TAKE TO PREVENT DIVERSION DURING TRANSPORT. IF YOU WILL BE USING A THIRD-PARTY CONTRACTOR FOR TRANSPORTING MEDICAL MARIJUANA AND MEDICAL MARIJUANA PRODUCTS, PLEASE EXPLAIN THE STEPS YOU WILL TAKE TO GUARANTEE THE THIRD-PARTY CONTRACTOR WILL BE COMPLIANT WITH THE TRANSPORTATION REQUIREMENTS UNDER THE ACT AND REGULATIONS.
## Section 12 – Storage of Medical Marijuana

<table>
<thead>
<tr>
<th>A. Storage Requirements</th>
<th>Yes</th>
<th>No</th>
</tr>
</thead>
<tbody>
<tr>
<td>By checking “Yes” to any statement, you affirm that the plan of operation will address the 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>
Pennsylvania Department of Health
Medical Marijuana Grower/Processor Permit Application

- 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:

N/A

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

Medical marijuana and medical marijuana products (collectively “Medical Marijuana”) storage areas will be designed to provide adequate lighting, ventilation, temperature, humidity, space, and equipment. All storage areas will be maintained in a clean and orderly condition, free from infestation...
### Section 13 – Packaging and Labeling of Medical Marijuana

**A. Packaging Requirements**

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

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:**

N/A
B. Labeling Requirements

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

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

<table>
<thead>
<tr>
<th>Requirement</th>
<th>Yes</th>
<th>No</th>
</tr>
</thead>
<tbody>
<tr>
<td>Any resemblance to the trademarked, characteristic or product-specialized packaging of any commercially available food or beverage product.</td>
<td>☑️</td>
<td></td>
</tr>
<tr>
<td>Any statement, artwork or design that could reasonably lead an individual to believe that the package contains anything other than medical marijuana.</td>
<td>☑️</td>
<td></td>
</tr>
<tr>
<td>Any seal, flag, crest, coat of arms, or other insignia that could reasonably mislead an individual to believe that the product has been endorsed, manufactured, or approved for use by any State, county or municipality or any agency thereof.</td>
<td>☑️</td>
<td></td>
</tr>
<tr>
<td>Any cartoon, color scheme, image, graphic or feature that might make the package attractive to children.</td>
<td>☑️</td>
<td></td>
</tr>
<tr>
<td>Each process lot of medical marijuana will be identified with a unique identifier.</td>
<td>☑️</td>
<td></td>
</tr>
<tr>
<td>Prior written approval of the Department will be obtained regarding the content of any label to be affixed to a medical marijuana package.</td>
<td>☑️</td>
<td></td>
</tr>
</tbody>
</table>

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

<table>
<thead>
<tr>
<th>Requirement</th>
<th>Yes</th>
<th>No</th>
</tr>
</thead>
<tbody>
<tr>
<td>Be easily readable.</td>
<td>☑️</td>
<td></td>
</tr>
<tr>
<td>Be made of weather-resistant and tamper-resistant materials.</td>
<td>☑️</td>
<td></td>
</tr>
<tr>
<td>Be conspicuously placed on the package.</td>
<td>☑️</td>
<td></td>
</tr>
<tr>
<td>Include the name, address and permit number of the grower/processor.</td>
<td>☑️</td>
<td></td>
</tr>
<tr>
<td>List the form, quantity and weight of medical marijuana included in the package.</td>
<td>☑️</td>
<td></td>
</tr>
<tr>
<td>List the amount of individual doses contained within the package and the species and percentage of THC and CBD.</td>
<td>☑️</td>
<td></td>
</tr>
<tr>
<td>Contain an identifier that is unique to a particular harvest batch of medical marijuana, including the number assigned to each harvest lot or process lot in the harvest batch.</td>
<td>☑️</td>
<td></td>
</tr>
</tbody>
</table>
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- Include the date the medical marijuana was packaged.  ☒  ☐
- State the employee identification number of the employee preparing the package and packaging the medical marijuana.  ☒  ☐
- State the employee identification number of the employee shipping the package, if different than the employee preparing the package and packaging the medical marijuana.  ☒  ☐
- Contain the name and address of the dispensary to which the package is to be sold.  ☒  ☐
- List the date of expiration of the medical marijuana.  ☒  ☐
- Include instructions for proper storage of the medical marijuana in the package.  ☒  ☐
- Contain a warning that the medical marijuana must be kept in the original container in which it was dispensed.  ☒  ☐
- Contain a warning that unauthorized use is unlawful and will subject the purchaser to criminal penalties.  ☒  ☐
- Contain the following warning stating:
  This product is for medicinal use only. Women should not consume during pregnancy or while breastfeeding except on the advice of the practitioner who issued the certification and, in the case of breastfeeding, the infant’s pediatrician. This product might impair the ability to drive or operate heavy machinery. Keep out of reach of children.  ☒  ☐

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

N/A

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

CMA will package and label each form of medical marijuana prepared for sale. CMA has designated a packaging and labeling room, where such activities will occur. Packaging for
medical marijuana will minimize the exposure to oxygen, be child-resistant, tamper-proof or tamper-evident, light-resistant, opaque, resealable and certified compliant with the Poison Prevention Packaging Act of 1970. Each process lot of medical marijuana will be identified by a unique identifier. Please find sample labels and product packaging in Attachment J.

Before using a label, CMA shall submit sample labels and obtain written approval from the Department as to the content of any label to be affixed to a medical marijuana package. No label may be affixed to a medical marijuana package unless the Department has given prior written approval. Labels will be easily readable in plain English and made of weather-resistant and tamper-resistant materials. The label is conspicuously placed on the package. The Inventory Technician, in coordination with the Director of Quality Assurance will ensure inspection and testing of all incoming materials is conducted. Any labeling or packaging materials that meet the appropriate written specifications may be approved and released for use.

All packaging labels must be compliant with the rules set forth by the Department and all applicable state and local laws, regulations, ordinances, and other requirements. All labels must be designed and applied so that the labels will remain in place and legible during the customary conditions of distribution, storage, and use. All packages containing medical marijuana must have a label. All labels must be conspicuously placed on packages.

Each label must include:
- CMA, address, telephone number, and permit number;
- Form, quantity and weight of medical marijuana included in the package;
- Date the medical marijuana was packaged;
- Date of expiration of the medical marijuana;
- List the amount of individual doses within the package;
- Species;
- Percentage of THC and CBD Unique identifier to the particular harvest batch of the medical marijuana;
- Number assigned to each harvest lot or process lot in the harvest batch;
- Employee identification number of the employee preparing the package and packaging the medical marijuana;
- Employee identification number of the employee shipping the package, if different than the employee described above;
- Name and address of the dispensary to which the package is to be sold. Instructions for proper storage of the medical marijuana in the package;
- The following warning statements:
  - “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,
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.”

Upon approval, CMA will use MJ Freeway, LLC’s electronic tracking system (MJ Freeway). MJ Freeway’s Application Program Interface (API) is designed to directly integrate with the Department’s electronic tracking system. State-specific settings within MJ Freeway software enable the appropriate details and messages to be captured and populated into the labels generated for all inventory created at CMA.

The Inventory Technician, in coordination with the Director of Quality Assurance will ensure inspection and testing of all incoming materials is conducted. CMA must obtain the prior written approval of the Department of the contents of any label to be affixed to a medical marijuana package. Any labeling or packaging materials that meet the appropriate written specifications may be approved and released for use.

Labels are easily readable with a minimum print size at least 1/16” of an inch. The sizes of the characters in the net weight statement are determined by the area of the principal display panel and may be greater than a 1/16” of an inch. Text on labels must be in black ink. Expiration dates must reflect the time after final packaging during which the product is fit for its intended use when stored and used. The Quality Assurance department will utilize stability test data, including shelf life testing to establish all product expiration dates.

Cannabinoid and terpenoid profile and potency levels, as determined by an independent testing laboratory, must include all components > 0.05%. The name of the independent testing laboratory which performed the test(s) must be included on the profile results. Medical marijuana products sold to a medical marijuana dispensary must have a specific concentration of total THC and total CBD and must have a consistent cannabinoid profile. The concentration of cannabinoids will be reported to the Department by the approved laboratory conducting the tests, and the results will be included on the label. The concentration of cannabinoids included on the label, as reported by the approved laboratory, includes:
- Tetrahydrocannabinol (THC);
- Tetrahydrocannabinol acid (THCA);
- Tetrahydrocannabivar (THCV). Cannabidiol (CBD);
- Cannabinadiolic acid (CBDA);
- Cannabidivarine (CBDV);
- Cannabinol (CBN);
- Cannabigerol (CBG);
- Cannabichromene (CBC);
- Any other cannabinoid component at > 0.1%.

Once packaged, the original seal will be placed and 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.

CMA will hire and train an Inventory Technician who is responsible for keeping and protecting all inventory and ensuring the accuracy of the inventory. They oversee purchasing, shipping, and receiving and ensure that incoming materials are receipted and managed appropriately and all outgoing medical marijuana is properly packaged and labeled. CMA will hire and train Packaging and Shipping Technicians who are responsible for weighing, counting, and ensuring accurate labeling and packaging of all medical marijuana. CMA will hire and train a Director of Quality Assurance who is responsible for ensuring that all medical marijuana meets the standards of quality, including reliability, usability, safety, packaging, labeling and performance.

The Director of Quality Assurance ensures strict control over packaging and labeling materials and examines packaged and labeled products during finishing operations to provide assurance that the containers and packages have the correct labels. They will collect a representative sample of units at the completion of finishing operations and ensure that the samples are visually examined for correct labeling and record the results of the examination. Any medical marijuana products that have been mislabeled, or labels that are incorrect will be separated for disposal.

CMA must ensure all packaging and labeling of medical marijuana is conducted in a manner that protects the quality and purity of the medical marijuana and is in accordance with the rules set forth by the Department and all applicable state and local laws, regulations, ordinances, and other requirements. CMA will ensure medical marijuana is packaged and sealed in containers approved by the Department. The original seal of a package must not be broken, except for quality control testing at a laboratory, for adverse loss investigations conducted by the Department, or by a dispensary that purchased the medical marijuana. Labeling must meet all GMP device master record requirements with respect to legibility, adhesion, and any other labeling measures, and be approved by the Department. All packaging operations are supervised by the Inventory Technician and/or the Director of Quality Assurance.

CMA utilizes pharmaceutical-grade packaging materials that preserve the quality and purity of the medical marijuana. Medical marijuana products are packaged and labeled in individual unit sizes then in bulk containers. Containers and packaging protect the contents from contamination and must not impart any toxic or deleterious substance to the medical
marijuana. Packaging must not, in any way, be designed to appeal to individuals under twenty-one (21) years of age. This includes, but is not limited to, designs with cartoon characters, animals, or images of the sort. Packaging may not bear any resemblance to the trademarked, characteristic or product-specialized packaging of any commercially available food or beverage product. Packaging may not bear any statement, artwork or design that could reasonably lead an individual to believe that the package contains anything other than medical marijuana. Packaging may not bear 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. Packaging may not bear any cartoon, color scheme, image, graphic or feature that might make the package attractive to children.

Hand packaging operations must be conducted on work surfaces that have been sanitized prior to packaging operations and after any contact with medical marijuana. Employees must utilize sterile gloves or sanitized utensils for packaging medical marijuana. Employees must clean his or her hands and exposed portions of his or her arms before putting on gloves. The scale used to weigh medical marijuana must be certified Legal-for-Trade and NTEP approved. Bulk medical marijuana containers must not exceed ten (10) pounds of medical marijuana. Single units of medical marijuana must not exceed 2.5 ounces of medical marijuana.

Labeling operations are designed to prevent mix-ups between similar products or labels. Before beginning any labeling operation in which a mix-up could occur, the production area and equipment, if any, must be thoroughly examined to make certain that any labeling materials remaining from previous operations have been removed. The surrounding area, tables, packaging lines, printing machines, and other equipment must be cleared of labels, packaging, and other materials used in the previous operation. When issued for use, labeling must be carefully inspected to make certain the contents of the labeling comply with the labeling specifications in the master record for the specific batch. The inspection must include batch numbers and expiration dates used on the labels. Documentation of the inspection, including the date and name of the employee performing it must be logged.

All labels used in labeling operations must be documented including the quantities of labels or labeling issued, used, and returned to storage. When a labeling reconciliation shows a discrepancy, the Director of Quality Assurance must investigate and determine, to the extent possible, the source of the discrepancy. Any deviation will be documented, explained, and approved by the Director of Quality Assurance. All excess labeling bearing batch, lot, or control numbers must be destroyed and disposed of.

Employees must not over-label (placing a new label over an old label), alter, obliterate, or destroy any label attached to a medical marijuana container or package. In the event of a labeling mistake, an employee must notify his or her supervisor immediately. All corrections
made must be documented and approved by the Inventory Technician.

Once ready for transportation to a dispensary or laboratory, medical marijuana will be packaged and placed in a shipping container. Transportation procedures are described in detail in the Transportation section 11. Shipping container do not permit the product to be visible from the outside of the container. Shipping containers are labeled with the type and quantity of medical marijuana that it contains as well as a RFID tag. The final weight of shipping containers must equal the container’s tare weight plus stated weight of medical marijuana product contained therein and confirmed in the inventory electronic tracking system.

Shipping containers are constructed and designed so that the containers cannot be opened during transportation of the product due to the usual and regular movement of the vehicle that is being used. Shipping containers permit easy access to its contents to permit inspection by authorized representatives of the Department and other government officials when necessary to perform their official duties.

Section 14 – Inventory Management

A. Electronic Tracking System

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

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).

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.

B. Inventory Management

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

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

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

- The number, weight, and type of seeds.
Pennsylvania Department of Health  
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<table>
<thead>
<tr>
<th>Requirement</th>
<th>Yes</th>
<th>No</th>
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</thead>
<tbody>
<tr>
<td>The number of immature medical marijuana plants.</td>
<td>☒</td>
<td></td>
</tr>
<tr>
<td>The number of medical marijuana plants.</td>
<td>☒</td>
<td></td>
</tr>
<tr>
<td>The number of medical marijuana products ready for sale.</td>
<td>☒</td>
<td></td>
</tr>
<tr>
<td>The number of damaged, defective, expired, or contaminated seeds, immature medical marijuana plants, medical marijuana plants and medical marijuana products awaiting disposal.</td>
<td>☒</td>
<td></td>
</tr>
<tr>
<td>Inventory controls and procedures will be established for the conducting of monthly inventory reviews and annual comprehensive inventories of medical marijuana at the facility.</td>
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</tr>
<tr>
<td>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.</td>
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</tr>
<tr>
<td>Comprehensive inventories of seeds, immature medical marijuana plants, medical marijuana plants, medical marijuana and medical marijuana products shall be conducted at least annually.</td>
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<td></td>
</tr>
<tr>
<td>A written or electronic record of the inventory reviews and comprehensive inventories must be created and maintained.</td>
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<td></td>
</tr>
<tr>
<td>The written or electronic record will include the date of the inventory, a summary of the inventory findings, and the employee identification numbers and titles or positions of the individuals who conducted the inventory.</td>
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</tbody>
</table>

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

N/A

**C. PLEASE DESCRIBE YOUR APPROACH REGARDING THE IMPLEMENTATION OF AN INVENTORY MANAGEMENT PROCESS. THIS APPROACH MUST ALSO INCLUDE A PROCESS THAT PROVIDES FOR THE RECALL OF MEDICAL MARIJUANA AND THE MANAGEMENT OF MEDICAL MARIJUANA PRODUCT RETURNS FROM A DISPENSARY:**
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>
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</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
## Section 16 – Diversion Prevention

<table>
<thead>
<tr>
<th>A. Diversion Prevention</th>
<th>Yes</th>
<th>No</th>
</tr>
</thead>
<tbody>
<tr>
<td>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.</td>
<td>☒</td>
<td></td>
</tr>
</tbody>
</table>

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**
### Section 17 – Growing Practice

#### A. Growing of Medical Marijuana

<table>
<thead>
<tr>
<th>Statement</th>
<th>Yes</th>
<th>No</th>
</tr>
</thead>
<tbody>
<tr>
<td>By checking “Yes” to any statement, you affirm that your facility will maintain the following practices for the growing of medical marijuana:</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>
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</tr>
<tr>
<td>• 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.</td>
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</tr>
<tr>
<td>• A log of all actions taken to detect pests or pathogens, and the measures taken for control, will be maintained.</td>
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</tr>
<tr>
<td>• Visual inspections of growing plants and harvested plant material will be performed to ensure there is no visible mold, mildew, pests, rot or grey or black plant material that is greater than an acceptable level as determined by the Department.</td>
<td>☑️</td>
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</tr>
<tr>
<td>• A system to monitor, record, and regulate temperature, humidity, ventilation, lighting and water supply will be installed.</td>
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</tr>
</tbody>
</table>

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

N/A

#### B. PLEASE PROVIDE A SUMMARY OF WHICH PESTICIDES, IF ANY, WILL BE USED IN THE GROWING PROCESS:

N/A
### Section 18 – Nutrient and Additive Practices

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

N/A

B. PLEASE PROVIDE DETAILS OF ALL NUTRIENT AND GROWTH ADDITIVES THAT WILL BE UTILIZED AT YOUR FACILITY:
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.
Section 20 – Sanitation and Safety

PLEASE PROVIDE A SUMMARY OF THE INTENDED SANITATION AND SAFETY MEASURES TO BE IMPLEMENTED AT YOUR PROPOSED FACILITY AND SITE. THESE MEASURES SHOULD COVER, BUT ARE NOT LIMITED TO, THE FOLLOWING: A WRITTEN PROCESS FOR CONTAMINATION PREVENTION, PEST PROTECTION PROCEDURES, MEDICAL MARIJUANA HANDLER RESTRICTIONS, HAND-WASHING FACILITIES, AND INSPECTION SCHEDULES TO ENSURE THE ACCURACY OF OPERATIONAL EQUIPMENT.

CMA understands its responsibility to the greater community, the environment and our patients. CMA is committed to implementing consistent, high quality, sustainable sanitation and safety practices across the entire growth cycle and processing of the marijuana plant. For these reasons, CMA has developed a full and complete sanitation and safety plan that is compliant with all the rules set forth by the Department and all applicable state and local laws, regulations, ordinances, and other requirements. CMA has also developed and will implement comprehensive standard operating procedures that extend to all of our operations, as has been implemented in Colorado. These procedures are designed to hold both CMA management and all employees accountable for CMA’s operations and identify individual and collective responsibilities. CMA’s standard operating procedures (“SOPs”) include a collection of best sanitation and safety practices.

CMA’s workplace safety policies and procedures will detail safety practices that meet or exceed the
best practices in the industry and comply with the Occupational Safety and Health Administration (OSHA) guidelines, as well as all applicable state and local laws, regulations, ordinances, and other requirements. Workplace safety policies and procedures will be strictly enforced and all employees will be required to comply with these policies as a condition of employment.

CMA is committed to doing the following:
- Provide a safe workplace.
- Strive to achieve the goal of zero accidents and injuries.
- Provide mechanical and physical safeguards wherever they are necessary.
- Conduct routine safety and health inspections to find and eliminate unsafe working conditions, control health hazards, and comply with all applicable OSHA safety and health requirements.
- Train all employees in safe work practices and procedures.
- Provide employees with necessary personal protective equipment and train them to use and care for it properly.
- Investigate accidents to determine the cause and to prevent subsequent accidents.
- Not discriminate against employees who exercise their “Whistleblower” rights.
- Annually review and update workplace safety policies and procedures.

CMA will create a safety committee consisting of a balance of department directors, managers, and key employees. The safety committee’s primary goals will be:
- Overseeing the implementation of CMA’s workplace safety program.
- Annually reviewing CMA’s safety policies and procedures.
- Maintaining accurate records and annually reporting the results of workplace accident and injury trend analysis.
- Recommending actions to reduce the frequency and severity of accidents and illnesses.
- Integrating safety into the day-to-day activities of all employees.
- Coordinating the new employee orientation and safety training programs.
- Assisting the Human Resources Manager to ensure CMA is compliant with all applicable state and local laws, regulations, ordinances, and other requirements concerning safety and health.
- Assisting department directors and managers with accident investigation.
- Conducting and recording periodic job hazard analyses to identify unsafe conditions and practices and to determine remedies.
- Making recommendations to the Director of Facilities or other appropriate director on matters pertaining to safety.

All employees will share responsibility for a safe and healthy workplace. All employees will:
- Report all unsafe conditions and unsafe work practices.
- Immediately report all work-related injuries.
- Wear the required personal protective and sanitary equipment.
- Abide by all workplace safety policies and procedures.
- Participate in CMA’s safety and health programs.

CMA will provide information to employees about workplace safety and health issues through regular internal communication such as:
Policies and procedures.
- Training sessions.
- Team meetings.
- Bulletin board postings.
- Memorandums.
- Other written communications.

All employees will be trained on the safety policies and procedures upon initial employment. Upon completion of training, the Director of Human Resources will document it in the Employee Training Log. A copy of CMA’s workplace safety and health communication policies and procedures will be made available to CMA employees.

In addition to the implementation of general safety measures, CMA will implement and provide continuous oversight on the five measures discussed below in order to establish and maintain a safe, sanitary Facility.

**Contamination Prevention**

CMA will ensure the sanitation and safety of the Facility by preventing contamination during the growing and processing of all medical marijuana. The Director of Facilities will ensure the Facility is maintained in safe and sanitary conditions to prevent the contamination of medical marijuana and processing equipment. All employees will be required to report unsanitary conditions in the Facility to their department manager.

Employee working in direct contact with medical marijuana are subject to the restrictions on food handlers in Section 27.153, and will be trained accordingly. It is imperative that all employees follow and understand basic food protection practices and maintain a high degree of personal cleanliness to prevent medical marijuana and medical marijuana product contamination. Employees will be required to wear CMA provided, professionally sanitized pocket-less scrubs, hair covering, and shoes before entering any areas that contain medical marijuana. Employees working in any area where marijuana is present, will first enter the locker room and remove street clothes, shoes, and all personal items, including phones and wallets, and place them into an individual locker. After exiting the locker room, staff will wash exposed skin thoroughly, then walk through a high-pressure fan removing any loose contaminants. Nitrile gloves will also be worn during all marijuana interactions.

The Facility will be designed and constructed in such a manner that all floors, walls, and ceilings can be adequately cleaned, kept clean, and maintained in good working condition. Equipment and surfaces, including floors, counters, walls and ceilings, shall be cleaned and sanitized as frequently as necessary in order to protect against contamination. All buildings and fixtures will be cleaned regularly and receive routine maintenance to ensure they are maintained in good sanitary condition. In addition, all counters and surfaces will be constructed so that they reduce the potential growth of microbes, molds and fungi, and can be sanitized easily. UV sterilization door strips and dip tanks will be used throughout the Facility. Equipment, counters, and surfaces for processing medical marijuana will be food grade quality and designed so that they do not react adversely with any solvent being used. CMA will only use sanitizing agents registered by the United States Environmental Protection
Agency, in accordance with the instructions printed on the label.

The water supply system will be installed by a licensed professional, and originate from a public water system, that is capable of providing a safe, potable, and adequate supply of water to meet the operational needs of the facility. The piping system must receive adequate maintenance and be of sufficient size and design to carry adequate quantities of water to the required places throughout the Facility. All drain areas will be maintained so that they do not contribute to the contamination of any medical marijuana or contact surfaces by seepage, filth, or any other extraneous materials, or by providing a breeding place for pests. Waste treatment and disposal systems will be maintained in good working order so that they do not constitute a source of contamination in any area. CMA will ensure that there are no cross-connections between the potable water lines and the sewage lines. Potable water will be under continuous positive pressure in a plumbing system free of defects that could contribute to the contamination of any marijuana. Drains will be of adequate size and, if connected directly to a sewer, will have an air break or another mechanical device to prevent back-siphonage. Toilet and handwashing facilities will be sufficiently provided, maintained in a sanitary condition, and have an adequate supply of adjustable hot running water, toilet paper, soap, and disposable towels. Effective nontoxic sanitizing cleansers and sanitary towel service or suitable hand drying devices will be provided. Emergency eye flushing stations will also be readily accessible to all employees of the Facility. A drip irrigation equipment will be installed to water the medical marijuana plants. The drip system and drain gutter includes a means for collecting leachate, and the drain gutter will channel the water to a drain located in the floor. The drain in the floor will collect to a drain pit that houses a submersible sewage pump to pump the water back to an irrigation room through a common drain pipe. In the irrigation room, the water must flow over a cloth filter and be stored into a “return” water storage tank and injected with an ECA oxidizer system to sterilize the water from bacteria. A second tank must be used to store fresh water. This tank must be filled with tap water that must pass through a reverse osmosis system before being stored. All water will be tested for ppm and pH frequently, in addition to testing to identify pathogenic microbes that may be present in water supplies, heavy metals, pesticide residues or other contaminants. Testing results are recorded in the Water Testing Log.

Contamination between components will be prevented. The flow of components, product containers, closures, labels, in-process materials, and marijuana through any Facility will be designed to prevent contamination. Equipment and utensils will be food-grade quality, cleaned, maintained and, as appropriate for the nature of marijuana, sanitized and sterilized at appropriate intervals to prevent malfunctions or contamination that would alter the safety, identity, strength, quality or purity of the marijuana.

During the cultivation process, once a plant is fully rooted, it will be inspected and scouted for disease and pests. Any infected plants or contaminated plants will be properly discarded in accordance with CMA’s waste disposal procedures (See Section 15). The remaining plants will be transferred to the Vegetative Room. If applicable, plants will be transplanted into a specific container based on the chosen cultivation technique and according to CMA’s standard operating procedures. Plants in the Flowering Room will be automatically fed and properly irrigated. Daily plant maintenance includes manicuring, pruning, scouting, and general monitoring.
Any marijuana plants that are diseased, expired, damaged, or non-viable will be immediately segregated and destroyed in accordance with Department requirements. The following procedures will be followed for the safe disposal of all marijuana waste or infected plants to prevent contamination:
- Plants will be inspected on a regular schedule per CMA’s policies and procedures discussed in Section 17;
- Affected plants will be covered with a specific plastic bag to prevent further contamination of the area;
- After covering the plants, the plants will be removed from the growing medium and the room;
- Affected plants will remain covered during the transportation to the quarantined disposal area;
- Once in the disposal area, plants will be safely mulched and mixed with approved waste and properly stored for disposal pickup; and
- After the disposal is complete, the process will be documented in the inventory management system.

There will be separate and defined areas, or other control systems such as computerized inventory controls or automated systems of separation, to prevent cross-contamination and mix-ups of components or marijuana during any of the following operations:
- Receipt, identification, storage, and withholding from use of quarantined components, packaging components, in-process materials, or marijuana pending disposition by Quality Assurance department.
- Storage of approved components, packaging components, or marijuana.
- Storage of in-process materials pending normal further processing.
- Storage of components, packaging components, in-process materials, and marijuana pending reprocessing.
- Separation of the cultivation, processing, packaging, labeling, and holding of different types of marijuana.
- Holding rejected components, product containers, closures, and labels before disposal.
- Storage of released components, product containers, closures, and labels.
- Storage of in-process materials.
- Cultivation operations.
- Processing operations.
- Packaging and labeling operations.
- Quarantine storage before the release of marijuana.
- Storage of marijuana after release.

Sanitation operations include the following:
- Floors, walls and ceilings made of smooth, hard surfaces that are easily cleanable.
- Temperature and humidity controls.
- An air supply filtered through high-efficiency particulate air filters under positive pressure.
- A system for monitoring environmental conditions.
- A system for cleaning and sanitizing rooms and equipment.
- A system for maintaining any equipment used to control sanitary conditions.
The following cleaning activities will be conducted daily at the Facility, or more often if necessary:
- All counters and workstations are thoroughly cleaned and sanitized.
- Dust under and around the computer units.
- Clean and tidy all cupboards and drawers.
- No unnecessary stickers, papers, or notes to be visible on or around the counter area.
- All computer wiring is clean and tidy.
- Empty and clean trash bins.
- Sweep and mop floors. Vacuum carpets, if any.
- Wipe and clean any other surfaces.
- Clean and sanitize bathrooms.
- Restock hand towels, soap and toilet paper.
- Mop up any water or dirt on the floor.

The grounds of the Facility will be kept in a condition that protects against the contamination of components, packaging components, in-process materials, marijuana, or contact surfaces. Animals will be prohibited except service animals.

**Pest Prevention Procedures**

CMA promotes the sanitation and safety of the Facility during the growing and processing of medical marijuana through the implementation of robust pest prevention procedures. The Facility will be designed, managed, and monitored to keep out pests, including insects, rodents, and other animals. Effective measures will be taken to exclude pests from the Facility and to protect against contamination of marijuana and contact surfaces. Litter and waste will be properly removed and disposed of to minimize the development of odor and the potential for attracting and harboring pests. The procedures for waste disposal will be maintained in accordance with waste disposal procedures as described in Section 15. Pests will not be allowed to inhabit any area of the Facility.

Pest protection starts by preventing outside pests from entering the Facility. To prevent the entry of mosquitoes, pests, and other insects into the Facility, adequate screens will be installed on all windows and exterior entrances. Employees will use appropriate traps and baits on a regular basis and replace as needed. Also, employees will be required to change into CMA issued scrubs and walk through a high-pressure fan to remove any loose contaminants before handling any medical marijuana and entering the facility.

CMA may use aeroponic, hydroponic, or geoponic cultivation techniques, or a combination of these techniques to grow and sustain plant and crop growth. Cultivation procedures will require daily plant care and handling to ensure that any disease or pest issue is discovered immediately. CMA will address environmental concerns raised by indoor marijuana cultivation operations, including provision of light, fresh air ventilation, cooling (required due to the energy density of lighting and ventilation), and control of pests and fungal agents, as well as preventing run through of nutrient waste and unnecessary discharge to protect water quality.

In addition to the contamination prevention procedures discussed above and the handler restrictions discussed below CMA will implement an organic integrated pest management system (IPM) to
prevent the infestation of marijuana at the licensed facility. Pesticide use is further discussed in Section 17B. The main components of IPM will include maximizing biological prevention methods to prevent, reduce, or maintain pest populations in accordance with USDA National Organic Program standards. The Cultivation Manager will be responsible for implementing and monitoring the IPM practices to predict potential levels of crop damage, mitigate risks, and control pests. All cultivation employees will receive training to perform plant inspections and be able to identify pests. IPM will include, among others, the following:
- Use of recognized and effective biological controls including predatory wasps and mites and nematodes, lacewings, ladybugs, pirate bugs, and others for preventative or mitigation purposes;
- Daily visual inspections of all planted material including assessing plants vigor, leaf color, and subtle changes such as a leaf curl, bite marks, webbing, and discoloration;
- Daily visual inspections of growing media for signs of insect infestation;
- Weekly mite brushing sampling throughout the harvest;
- Pheromone-baited sticky traps placed throughout the cultivation areas to notify of and identify the presence of potentially harmful insects;
- Applying beneficial insects and microorganisms as the first measure;
- Quarantining and disposing of infected plants; and
- Using Department approved pesticides as a last resort.

The Cultivation Manager will establish inspection schedules for each crop. At a minimum, detailed visual microscopic and naked-eye inspection of each crop will be performed and documented weekly. To detect early infestations, a crop scouting program that includes both sticky trap cards and visual inspection for pathogens and crop disease is necessary. Scouting will be done twice a week, and more often after an infestation is detected. Regular scouting is also necessary to monitor the efficacy of control measures. A hand lens will be used to detect live pests as well as signs of pest activity. All crops will be inspected by two or more trained employees. Employees performing the inspections will record findings, including, organoleptic characteristics, presentation of the material, presence of admixtures or foreign matter, signs of pest infestations, changes in biological colonies, mold or mildew, changes in appearance of the media, leaf and tip burn, discoloration, spotting, and changes in stalk density and branch elasticity.

Application and storage of pesticides will be in accordance with label recommendations and all applicable state and local laws, regulations, ordinances, and other requirements. Poisonous or toxic materials, including but not limited to insecticides, rodenticides, detergents, sanitizers, caustics, acids, and related cleaning compounds will be stored in a separate area from the marijuana in prominently and distinctly labeled containers.

**Medical Marijuana Handler Restrictions**

A third measure of CMA that promotes the sanitation and safety during the growing and processing of medical marijuana is to limit the number of people handling medical marijuana and provide proper equipment to employees who will be in contact with medical marijuana. Restrictions on the handling of medical marijuana begin with restricted access areas in the Facility. Restricted access areas include all areas accessible only to the minimum number of employees essential for efficient operation, and authorized representatives of the Department and other government officials when necessary to
perform their official duties. Restricted access areas will be separate, isolated, designated areas. Each area will be secured with strict security measures and locked at all times with non-residential, commercial-grade biometric locks. Each area will be monitored at all times via security cameras. Entry into restricted access areas will only be permitted by use of a valid keycard with the appropriate permissions and required biometric reading. These authorized employees may only enter and remain within a restricted access area if they have a legitimate job task. Restricted access areas, at a minimum, will include: cultivation areas (grow, drying, and processing), quality assurance testing areas, packaging and labeling, marijuana storage vaults, record storage room, security surveillance equipment room, security office, electrical room, IT/telecommunications room, quarantine areas, receiving area, and loading area. Details on our security plan is further detailed in Section 10.

CMA will ensure all marijuana is cultivated in a safe and sanitary manner and to ensure the identity, strength, quality, and purity of marijuana is maintained. All employees will follow all standard operating procedures regarding employee health and sanitation. Employees will be required to wear CMA uniforms that are provided, with professionally sanitized pocket-less scrubs, hair coverings, and shoes before entering any areas with marijuana. Employees working in any area where marijuana is present will be required to first enter the locker room and remove street clothes, shoes, and all personal items, including phones and wallets, and place them into an individual locker. After exiting the locker room, staff will wash exposed skin thoroughly, then walk through a high-pressure fan removing any loose contaminants. Sterile nitrile gloves will also be worn during all marijuana interactions.

Additionally, CMA has developed personal protective equipment (PPE) policies and procedures to protect employees and prevent the contamination of medical marijuana during the manufacturing process. The Director of Facilities and the Director of Processing will be responsible for implementing and overseeing all aspects of CMA’s PPE policies and procedures.

The following PPE will be provided to all manufacturing and facilities department employees and any other employees performing activities where such PPE may be deemed necessary:
- Accessible eye wash stations with sufficient quantities of water;
- Uniforms with some level of fire resistance;
- Adjustable safety glasses;
- Chemical resistant gloves;
- Boots with water resistance and slip protection;
- Adjustable N-95 or P-100 disposable respirators;
- Adjustable full-face air purifying respirator with a minimum of a P-100 filter, fitted by a qualified professional; and
- Tyvek coveralls.

Employees will receive training, and follow-up as well as periodic follow-up training to promote and maintain the importance of a safe and sanitary Facility.

**Hand-washing facilities**

CMA promotes the sanitation and safety of the Facility by providing easily accessible hand washing
facilities and lavatories. The facility will be equipped with an adequate number of lavatories for the volume of visitors and employees, be readily accessible, and maintained in a sanitary condition and in good repair. Hand washing facilities are placed strategically around the facility where needed and include a sink with adjustable hot and cold water, soap, and paper towels. Effective nontoxic sanitizing cleansers and sanitary towel service or suitable hand drying devices will be provided. Frequent handwashing is required during all cultivation and manufacturing activities to prevent contamination and ensure the highest sanitation and hygiene standards. Handwashing will be enforced by the Director of Cultivation and the Director of Processing. Employees that do not comply with handwashing requirements may be terminated. As such, all employees are required to wash their hands thoroughly at a handwashing station before beginning their work, before working on the cultivation or processing of marijuana, and at any other time that their hands have become dirty or contaminated.

To facilitate employee compliance with handwashing requirements, easily accessible hand washing facilities will be located throughout the Facility. Handwashing station will be available in all the rooms used for the cultivation and processing of marijuana, all toilet facilities, the employee breakroom, as well as where good sanitary practices require employees to wash and sanitize their hands. CMA will display instructive handwashing signage throughout the Facility in all areas with handwashing sinks in multiple languages, as needed. The proper procedure that should be followed by employees, as published by the Center for Disease Control and Prevention website, is:
- Wet hands with clean, running water (warm or cold), turn off the tap, and apply soap.
- Lather hands by rubbing them together with the soap.
- Be sure to lather the backs of hands, between fingers, and under nails.
- Scrub hands for at least 20 seconds.
- Rinse hands well under clean, running water.
- Dry your hands using a clean towel or air dry them.

**Inspection Schedules**
The fifth measure of CMA that promotes the sanitation and safety of the Facility is the regular inspection and maintenance of operational equipment. Equipment will be inspected, calibrated, maintained, and sanitized at appropriate intervals to prevent malfunctions or contamination that would compromise the safety, identity, strength, quality, or purity of the marijuana product beyond its established specifications. Inspections of equipment, at a minimum, will be done according to the manufacturer's recommendations and documented in the Equipment Maintenance Log.

The Director of Facilities will be responsible for maintenance of all operational equipment and for ensuring all equipment is in accordance with standard operating procedures, manufacturer’s instructions, and all applicable state and local laws, regulations, ordinances, and other requirements.

The Director of Facilities will maintain written procedures assigning responsibility for sanitation and describing in sufficient detail the cleaning schedules, methods, equipment, and materials to be used in cleaning the Facility. Such written procedures will be followed, and records of cleaning and sanitation will be kept. Tradespeople or contractors will be informed of and held to sanitation standards while working on the premises. All major pieces of equipment will be uniquely identified.
and have a dedicated Equipment Cleaning and Maintenance Log. All equipment cleaning and maintenance will be documented and recorded. The Quality Assurance Specialist will audit or check equipment cleaning and maintenance and its documentation on a random basis several times a week. Such checks will include the actual equipment cleanliness and the cleaning log documentation.

CMA will also conduct quarterly audits and inspections of the Facility to ensure all departments are compliant with CMA policies and procedures. CMA will conduct quarterly compliance audits to ensure the Facility is, at all times, compliant with the rules set forth by the Department and all applicable state and local laws, regulations, ordinances, and other requirements. The Human Resources Manager, in coordination with the Chief Executive Officer, Chief Operating Officer, and department heads, will conduct the compliance audits.

Additionally, CMA will conduct quarterly health and safety inspections to ensure the Facility is, at all times, compliant with all applicable state and local laws, regulations, ordinances, and other requirements regarding the health and safety of its employees. The Director of Quality Assurance, in coordination with the Chief Operating Officer and department directors and managers, will conduct the health and safety audits.

Specific operating equipment that will be inspected, at a minimum, according to the manufacturer’s recommendations include:
- Drip irrigation system to ensure marijuana is protected from contamination;
- Dehumidifier system to help control mold and pathogen growth;
- Odor control equipment; and
- Grinding equipment

The implementation of the policies and procedures discussed above are designed to facilitate a safe and sanitary facility. However, to ensure a safe and sanitary facility, cooperation and teamwork will be required by every employee of CMA. The policies and procedures will be updated as necessary, including, when unforeseen circumstances arise or when best industry practices change or improve.

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
CMA is committed to maintaining complete, accurate, and comprehensive records at CMA’s Facility. All records will be stored in original or written form, in electronic form, through the electronic inventory tracking system as required, and backed up on an electronic secure cloud storage system maintained on CMA’s protected network servers. CMA’s network servers are protected by enterprise-class firewall systems, biometric locks, and twenty-four-hour surveillance.

CMA must keep all necessary books and records in order to render a full account of all operations conducted at the Facility under its license for the year to date and the five (5) years prior. As such, all CMA records will be retained on-site at the Facility for a term not less than five (5) years, and all sales records and invoices will be retained for at least two (2) years after termination of operations. All completed paper logs, forms, and records must be scanned, uploaded, and retained on CMA’s network servers and CMA will maintain an electronic back-up system for secure storage of all electronic records. CMA’s medical marijuana-related records will be entered and retained in the Department-approved electronic inventory tracking system, as required.

The Department and its authorized agents, upon request, will be granted access to review and, if necessary, make copies of books, records, papers, documents, data, or other physical or electronic information that relates to the business of CMA, including financial data, sales data, shipping data, pricing data, and employee data, visitor logs, etc.

The COO, in coordination with the Department directors and managers, are responsible for ensuring all documentation required by CMA and the department are maintained in accordance with CMA’s procedures and with the rules set forth by the Department and all applicable state and local laws, regulations, ordinances, and other requirements. CMA’s standard operating procedures will detail the maintenance of records and measures for addressing and reporting any loss or unauthorized alteration of records.

CMA is aware that required recordkeeping often involves the recording and storage of protected, confidential information. As such, access to confidential or protected information will be restricted to essential employees, provided that access may be granted to representatives of the Department and other government officials if necessary to perform their official duties. The Director of Security is required to notify appropriate law enforcement authorities and the Department within twenty-four hours after the discovery of theft or physical loss of confidential records. CMA’s Facility is not open to the public and all access to the Facility will be documented and recorded through the use of Employee Access Control Logs, and Visitor Logs.

All records and logs described and required herein will be maintained and reviewed by the appropriate supervisor. All logs, forms, and records must include a date and time stamp, as well as the name and identification number of the employee completing the action being documented.

MJ Freeway’s (MJF) Application Program Interface (API) is designed to directly integrate with the
Inventory Tracking System designated by the State of Pennsylvania, where information relevant to this section is automatically updated in real-time. MJF has successfully integrated with state systems in other states and is absolutely committed to ensure that every licensee only enters key traceability information into MJF which then will communicate via an API with the designated state system.

Detailed information that can be communicated via API includes inventory levels and sources, both the gross and net weight of products, purchase activity that is compliant with purchase limits, all destruction activities such for plants, waste, spoiled products, and any destruction for any other cause. As part of the plant harvesting process, where a harvest batch is created by harvesting one or more plants, each plant is weighed individually as the plant is harvested and the total weight of the plant is recorded. As the plant is de-fanned and prepared for drying, all waste is collected, weighed, recorded, and can be communicated to the state’s system via the API.

Proper environmental conditions including air temperatures, humidity, ventilation and root temperatures are essential for healthy plant growth through all cultivation stages. CMA is committed to providing the optimal environment for cannabis plant growth and believes that accurate, systematic recordkeeping is critical to maintaining this environment. The Cultivation Manager must develop a checklist for environmental awareness and general plant health care factors, as well as assign responsibility of tasks, determine frequency, and monitor performance.

Plant health care factors include monitoring the following aspects:
- Facility: cracks sealed immediately; proper insulation; use of aspiration boxes; pipes and thermostats services frequently;
- Sanitation and hygiene: proper attire; frequent hand-washing; waste material properly disposed of;
- Environmental control: doors closed completely; temperature, humidity and CO₂ levels monitored frequently; proper distance between plant canopy and light fixtures maintained; power outage plan maintained;
- Cultivation areas: reflector ducting well sealed; free of litter and other refuse; plant materials from pruning removed as needed; sanitized weekly and after each harvest;
- Equipment and tools: sanitized and stored after every shift and operation; rooting hormone not reused and discarded; sanitize containers prior to each use; hoses stored off the floor;
- General plant care: infected plants disposed of properly; clones, cuttings, seeds and mother plants isolated from vegetative or flowering areas; clones checked daily for rot; plants have lateral room for branching; plant foliage is dry prior to dark periods; plants irrigated as early as possible in light period; plants inspected daily; media is not reused;
- Integrated pest management: variety of acceptable mechanical, physical and biological prevention controls implemented; plants inspected daily.

The Cultivation Manager must ensure the daily monitoring of all environmental factors including temperature, humidity, ventilation, water supply, lighting and proper pressurization. All cultivation areas must be equipped with stand-alone environmental monitoring systems. CMA will utilize the Smart Bee Controller, a technology that monitors and records light, temperature, humidity, CO₂, soil, and irrigation. The Cultivation Manager must manually record all environmental condition data as displayed by the Smart Bee Controller into the Crop Maintenance Log at the beginning and end of
Environmental monitoring parameters must include, at a minimum:
- Maintenance of temperatures between 75°F and 86°F Fahrenheit.
- Maintenance of relative humidity between 55% and 75% in Propagation Rooms.
- Maintenance of relative humidity between 40% and 60% in Vegetative and Flowering Rooms.
- Maintenance of CO₂ between 800 and 1,200 ppm.
- Light bulb replacement indicators.
- Lights operating within 80% capacity.
- Air change rates appropriate for size of room.

In addition to monitoring and recording environmental conditions, the Cultivation Manager is responsible for ensuring that environmental monitoring technology is properly calibrated and operating at all times. All service or calibration performed on facility equipment must be documented in the Equipment Maintenance Log described below.

Environmental monitoring equipment installed in the Facility must be approved by the Director of Facilities and the Director of Cultivation. CMA’s environmental monitoring equipment includes chemical detectors capable of detecting carbon monoxide, low oxygen, and explosive environments, provides twenty-four-hour monitoring of lighting, temperature, humidity, air change rates, and carbon dioxide levels, is capable of recording at least thirty days of readings, and provides text alerts as well as audible alarms. Heating, ventilation, cooling, and air filtration will be installed by a licensed professional, regularly inspected, and maintained. Results of inspections of all HVAC systems will be recorded in the Equipment Maintenance Log. Regular in-house testing (see Section 17) must also be scheduled by the Cultivation Manager based on current operational needs and recorded in the Crop Maintenance Log.

The Director of Facilities must have the water source tested quarterly, after any unusual natural disaster, or when ppm/pH readings change significantly. Testing must identify pathogenic microbes that may be present in water supplies (e.g., E. coli and other coliforms), heavy metals, pesticide residues, or other contaminants. All water will be tested for ppm and pH frequently, in addition to testing to identify pathogenic microbes that may be present in water supplies, heavy metals, pesticide residues or other contaminants. Test results must be recorded in the Water Testing Log.

CMA will maintain records of the type and amounts of fertilizers and any growth additives used. Each mixture must be recorded in the system and the Crop Maintenance Log and labeled with an identification number for application records. The Cultivation Manager shall implement a detailed checklist for all fertilizer/nutrients utilized (see Section 18).

MJF’s GrowTracker software allows CMA’s Facility to catalog all individual ingredients that are to be applied to plants. Ingredients may represent grow medium, nutrients, pesticides, fungicides, or any other additives. Once each ingredient stock level has been entered into the database, individual
ingredients may be virtually combined in the form of recipes that represent the prescribed amount of each ingredient to apply to plants in each stage of life. This nutrient practice allows for physical mixes to be created and as ingredients are applied to plants, mixes append the details of each application to the individual plants’ historical record.

The Cultivation Manager must also maintain a current plant spraying and feeding schedule in the Crop Maintenance Log. Any variance from the published schedule must be pre-approved and recorded in the Procedure Variance Log, and records of published schedules must be maintained in the Crop Maintenance Log for twenty-four months at a minimum.

The schedules must detail the following for each crop:
- Product to be applied;
- Reason for application;
- Method of application;
- Frequency of application;
- Next scheduled date of application;
- Employee responsible for next application;
- Status of lights, HVAC, and air circulation during application (e.g., lights on, HVAC off, and fans off);
- Personal Protective Equipment required for application (e.g., mask required, Tyvek suit optional);
- Restrictions preventing application (e.g., do not apply within four hours of any foliar application);
- Life Cycle Stage restrictions - (e.g., apply in vegetative state only or may be applied in all stages);
- Re-entry intervals;
- Posting requirements;
- Other precautions (e.g., cover medium).

All department directors and managers must ensure all chemicals and products used at CMA within their department are included in the Hazardous Chemicals Inventory List. Each chemical entry on the Hazardous Chemicals Inventory List shall have a corresponding Material Safety Data Sheets (“MSDS”) available for providing specific hazard information and personal protective measures. The Facility Hazardous Chemicals Inventory List will be maintained in accordance with 29 CFR 1910.1020, and kept for at least thirty years. The Director of Facilities will ensure the list is updated quarterly to remove chemicals that are no longer in use at CMA, to maintain compliance with regulatory requirements, as well as to add new products.

In addition, CMA will maintain a list of all pesticides that may be used in the Facility that includes copies of the labels and MSDS. Pesticide application records are required to be completed within twenty-four hours of the completion of the application and maintained at the facility for at least five years.

The Director of Cultivation shall maintain a record of each application of a pesticide that contains the following information, at a minimum:
- Date and time of application;
- Re-entry information, including date and time;
- Place of application, including the specific block, section, or plants treated;
Size of the area treated;
Product name of every pesticide used;
U.S. EPA registration number, as required;
Total amount of every pesticide used in pounds, ounces, gallons, or liters, applied to a treated area;
Dosage or rate of application of every pesticide used;
If applicable, the names of all individuals involved in making the pesticide and the permit or certification numbers of the individuals making or supervising the application;
Copies of pesticide labels and Safety Data Sheets for all pesticides used.

Pesticide records shall be made immediately available to the Department or its authorized agents and medical personnel or first responders in the event of an emergency. These records will also be available to the Department of Agriculture for inspection upon request.

Harvest records must be logged in the Crop Maintenance Log and must include, at a minimum:
Dates of planting and of harvest;
The quantity of the harvest;
The life cycle stage of the crop at the time of harvest;
Relevant crop conditions throughout its cultivation;
Beginning and ending weights of each batch before moved to the drying room.

Processing records must be logged in the Crop Maintenance Log and must include, at a minimum:
Description of equipment used for each processing operation, including sufficient information to demonstrate the condition of the equipment at each harvest.
List of each employee working in each processing operation, including documentation that each employee followed safety and hygiene procedures.
Documentation of drying conditions and times; beginning and ending moisture content of each crop; and any additional information relevant to the drying process.
Beginning and ending weights of each batch entered in the inventory electronic tracking system.

CMA will maintain accurate and comprehensive records of all equipment cleaning and maintenance conducted at the Facility. All major pieces of equipment will be uniquely identified, and all cleaning and maintenance will be documented and recorded in the Equipment Maintenance Log. At a minimum, the following information must be documented in the Equipment Maintenance Log every time a service is performed:
Manufacturer information;
Date equipment was put into service;
Service performed (cleaning or maintenance);
Date and time of cleaning or maintenance;
Date and time of calibration, if applicable;
Detailed description of cleaning or maintenance;
Name of employee who cleaned or serviced it;
Name of tradesperson, if applicable;
Date when next service is required.
The employee servicing or cleaning the equipment is responsible for promptly and accurately recording information in the Equipment Maintenance Log.

A Department-approved electronic tracking system will be CMA’s primary virtual system used to track medical marijuana inventory. CMA will also use MJF. MJF is a comprehensive tracking management platform that provides real-time tracking and accountability for the entire plant’s life cycle “from seed to sale”. The accountability of the cultivation process includes tracking plants through the cultivation facility from seeds or clones, into the vegetative stage, the flower stage, and through the post-harvest stage, which includes batching, drying, curing, manufacturing, and distribution/sales process. The cultivation accountability includes transaction-level accountability by recording every action to the plant, such as plant movement, nutrient feeding, pesticide application, and grower notes. Every action appears on the plant history detail record with the time/date, user credentials, the actions performed, and the status change details. MJF’s seed-to-sale software provides the ability to track all seeds, plants, and finished product throughout all stages of production, to include: propagation, vegetative growth, flowering growth, harvest and post-harvest procedures (i.e. drying, trimming, curing, etc.), packaging, distribution, processing, and storage. User profiles for individuals working at a facility are tied to transactional information as each action performed to any plant or inventory on hand is logged into the database. These records keep track of all inventory adjustments or reconciliations performed.

CMA will ensure that each day’s beginning inventory, acquisitions, harvests, sales, disbursements, disposal of unusable medical marijuana and ending inventory are documented. CMA will keep precise and complete inventory management records that render, balance and evidence all activities (from seed to sale or disposal) regarding all medical marijuana in its possession. CMA must prepare reports and submit them to the Department, as requested, and as stated above, all inventory records will be available to the Department at all times.

| Number, weight and type of seeds; |
| Number of immature medical marijuana plants; |
| Number of medical marijuana plants; |
| Medical marijuana in-process; |
Materials used in cultivation and processing;
Finished product;
Labeling, packaging, and other non-medical marijuana materials;
Number of medical marijuana products ready for sale;
Number of damaged, defective, expired, or contaminated seeds, immature medical marijuana plants, medical marijuana plants and medical marijuana products awaiting disposal;
Medical Marijuana waste.

CMA’s inventory electronic tracking system must keep a record of all medical marijuana cultivated, including, but not limited to:
Start-up inventory;
Unique plant identification number;
Batch number to which the plant is assigned;
Origination of batch (from seed or clone);
Genetic history of seed or clone;
Strain name assigned to batch;
Total number of seeds or clones planted in batch;
Date batch was planted;
Any ingredients and chemical additives used in the cultivation, including nonorganic pesticides, herbicides, and fertilizers;
Pest monitoring and actions taken, if any;
Any labor performed on the plant, such as pruning, repotting, or watering;
Total number of seeds or clones in batch grown to maturity;
Vegetative period;
Flower period;
Harvest date;
Drying period;
Curing period;
Weight of medical marijuana after harvest and during processing;
Testing results of the harvested product;
The final yield weight of processed usable medical marijuana;
The location of each plant and its finished product at all times;
Any procedure variances;
Crop destruction, if applicable;
Storage and transfer information;
The name and identification number of the employee responsible for each action taken with the plant and batch, and date and time action took place.

CMA’s inventory electronic tracking system must keep a record of all non-medical marijuana materials in the Facility, including, but not limited to:
Receiving and Control number;
Name of material and item number;
Supplier name and lot number;
Quantity and location.
Batches can be sampled and sent to a certified laboratory for testing. Prior to sending the physical sample to the testing facility, MJF’s testing interface can be used to electronically send the sample unique ID and details to the testing facility. When the testing facility completes testing, the results are electronically returned to the licensee via the API and attached to the batch. Lab results are captured and stored as a record the “batch” level of the product. This causes the appropriate lab results to be associated with each “lot” of the corresponding “batch”. These lab results are captured to populate the data necessary for state-specific labelling of each package to be generated through the system. Labels will display the appropriate cannabinoid profile results.

Within GrowTracker and MixTracker, storage locations can be created to represent the physical locations where any plants or inventory are stored. The storage locations can be used to isolate expired, damaged, deteriorated, mislabeled or contaminated inventory from the remaining inventory and would be created to correspond with the locked storage areas where the physical product awaiting disposal is being stored.

All sales must be recorded properly, accurately, and completely entered in the electronic inventory tracking system. Reports must include the name of every medical marijuana organization to whom the medical marijuana was sold, delivered or transferred, its permit number, the quantity sold, delivered or transferred to them, and the date of the transaction. At the end of the first year in operation, CMA will also begin making quarterly reports to the Department providing the amount of medical marijuana sold by the CMA during the period for which the report is being submitted, and the per-dose price of an amount of medical marijuana sold by CMA to a medical marijuana organization in a unit of measurement to be determined by the Department. CMA will maintain these records and reports (in print and digital form) for a period of five (5) years, and the records must be available for inspection and reproduction to the Department, state and federal authorized officials, and any other persons who may be authorized by the Department.

All employees must ensure the accuracy of all information entered in the electronic tracking system. Any inaccuracies or omissions may be considered a violation by the Department, and, any employee
All vendors, contractors and other individuals requiring access to the facility for purposes regarding the growing, processing, or testing of medical marijuana shall be required to present government-
CMA is also required to maintain accurate and comprehensive Facility workplace safety records. These records include but are not limited to, Employee Personnel Records, Employee Training Records, Hazard Communication Training Records, Accident Reports and more. CMA will keep a detailed log of work-related injuries and illnesses using OSHA Form 300 or similar document. Each February through April, CMA will post a summary of the injuries and illnesses recorded the previous year using OSHA Form 300A or similar document. The Human Resources Manager will ensure the accuracy of these records and maintain them at the Facility for at least five years.

In an effort to prevent work-related injuries and to maintain a safe work environment, employees will receive training on the performance of all assigned functions, including proper recordkeeping practices. CMA will maintain records of any training received by employees, including in-house training, records of each employee’s relevant qualifications, the names, addresses and qualifications of any consultants hired and the services they provided, and the attendance records of its principals and employees. The Human Resources Manager is required to maintain all CMA training records and logs in each employee’s personnel file, and these files shall be available to the Department and its authorized agents, upon request.

In the event of an injury or incident, all incident activities, from receipt of the initial report through post-incident review, will be documented. The Director of Security will ensure all events are recorded,
assembling the records in preparation and performance of the post-incident review, and ensuring all records are preserved and reported for review.

The following must be included, at a minimum, in the Post-Incident Report:
A description of incident events with specific timelines;
Employee(s) involved;
Non-employees involved;
Impact to affected parties;
Discussions, decisions and assignments made;
Successful and unsuccessful activities;
Notifications required or recommended;
Steps taken for containment and resolution;
Recommendations for prevention and remediation (short-term and long-term);
Identification of policy and procedure gaps;
Results of post-incident review;
Any necessary follow-up actions.

The Post-Incident Report must be distributed to the Director of Security, Chief Operating Officer, and the Chief Executive Officers for review. The Director of Security will ensure the appropriate employees are assigned to any follow-up actions. The Director of Security will document the completion of all follow-up actions in the Post-Incident Report and distribute an updated copy.

The Director of Security must report all transportation incidents to the COO record them in the Transport Incident Report Log. The Director of Security shall report to the Department and appropriate local authorities any vehicle accidents, diversions, losses, or other reportable incidents that occur during transport. If CMA discovers a discrepancy in the transport manifest, the Director of Security, shall conduct an investigation, amend the standard plan of operation if necessary, and submit a report of the investigation to the Department.

MJF’s integrated transport manifest feature includes detailed information (see Section 11). MJF’s document management system allows users to attach any relevant information to the manifest in the multiple formats. Our HIPAA-compliant secure servers retain all information for recall on-demand, ready for inspection by authorities.

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

SECTION 23 – ORGANIZATIONAL STRUCTURE

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Pennsylvania Department of Health
Medical Marijuana Grower/Processor Permit Application

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

Applicant’s Organization Documents
State of Incorporation or Registration: Pennsylvania  Date of Formation: 03/17/2016
Business Name on Formation Documents: Commonwealth Medical Alternatives, LLC

Applicant’s Identification Numbers
Federal Employer ID number: [Redacted]
PA Unemployment Compensation Account Number: [Redacted]
PA Department of Revenue Tax number (if applicant is currently doing business in Pennsylvania): [Redacted]
PA Workers’ Compensation Policy Number (if applicant is currently doing business in Pennsylvania): [Redacted]

The applicant affirms that workers’ compensation insurance will be obtained by the time the Department determines you to be operational under the Act and regulations. ☒ Yes  ☐ No

SECTION 24 — BUSINESS HISTORY AND CAPACITY TO OPERATE

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

Commonwealth Medical Alternatives (CMA) is a vertically integrated start-up company intent on establishing cultivation, processing, and dispensing operations in the medical marijuana industry in western Pennsylvania. Although defined as a start-up, CMA founders have more than five decades of business experience and a demonstrated ability to plan and maintain financially sustainable operations, both in and out of the medical marijuana field. In addition, CMA consists of leadership with expertise in marijuana industry compliance, cultivation best practices, legal and regulatory issues, security, diversity, and extraction technology.

Beyond our team’s experience, we believe we will maintain a successful operation because we will be guided by the following core values:

• Integrity. We believe in open and honest communication always among ourselves, with our business partners, with regulators, with our patients, and within the communities in which we operate.

• Teamwork. We believe fundamentally in building a company and working together as a team, regardless of the role or compensation of the individual team members.
Operational Excellence. We work hard to realize operational excellence across all our businesses, and we create and implement best practices in all aspects of our business in pursuit of excellence.

The Leadership Team

CMA has assembled a team with the passion, knowledge, and experience necessary to run a highly successful medical marijuana operation. They have deep roots in Pennsylvania, a commitment to public service, and a thorough understanding of the values of the Commonwealth. Collectively, its members have treated cancer patients, run a successful manufacturing business based in Pittsburgh, and operated or advised numerous state-regulated medical marijuana facilities in the U.S. Guided by the following individuals, CMA intends to be the paragon for medical marijuana in the Commonwealth of Pennsylvania.

Tip Paul, Co-CEO: In some ways, running a medical marijuana cultivation and processing operation is like running any other manufacturing businesses. You must purchase and track supplies, monitor the use of utilities, and manage employees – all with an eye toward remaining profitable and, hopefully, growing. CMA is therefore fortunate to have as its Co-Chief Executive Officer T.H. “Tip” Paul, who has run a highly successful manufacturing operation in Allegheny County. Tip Paul is the President and owner of P.E.I. Pittsburgh, a leading manufacturer, converter, and distributor of world-class electrical insulation materials. At P.E.I., Mr. Paul has demonstrated an undeniable ability to plan and maintain a successful and financially sustainable operation. Originally founded in 1947, P.E.I. has grown, under Mr. Paul’s leadership, from two employees in 1995 to nearly 50 employees in 2016, and has expanded from one office in Pittsburgh to offices in Texas; Chile; and China. Today, it serves global customers in the industrial electric motor, transformer, power generation, and transportation industries.

Mr. Paul’s experience will be invaluable to CMA as it operates as a grower/processor supplying numerous dispensaries in the state. He has built P.E.I. to be an entrepreneurial and nimble organization that works directly with customers, such as Seimens, G.E., 3M, Dupont, Caterpillar, and others, to provide customized solutions to technical problems. The company’s approach is to develop deep personal relationships with customers to maximize the value of their supply chain. Beyond customized solutions, P.E.I. works closely with customers to educate them about company products, and develops partnerships where doing so helps customers to meet market demand. Under Mr. Paul’s leadership, CMA will do the same, hosting educational programs for dispensary operators, physicians, and patients.

In addition to unique, customer-specific solutions, P.E.I. has developed industry-leading logistics and shipping and can meet market demand in national and international markets. The knowledge Mr. Paul has acquired in this area will serve CMA well as it manages logistics within the Commonwealth.

Mr. Paul is motivated to create a grounded business model for CMA that focuses on best practices – from managing a diverse workforce to producing technical and complex products to developing trust-based relationships with employees, key partners, regulators, patients, and the communities in which CMA operates.

Chuck Knoll, Jr., Co-CEO: CMA’s other Co-CEO, Charles A. Knoll, will bring to the company a deep commitment to the community that will permeate all aspects of its operation and contribute to its
Overall success. Mr. Knoll’s family settled Pennsylvania in the 1820’s and since that time various ancestors have been public servants holding offices such as Councilman, Burgess, State Treasurer, and Lieutenant Governor. Mr. Knoll himself has decades of experience in community law and a deep commitment to public service. Since graduating from Duquesne University School of Law, Mr. Knoll has been a solicitor with Bethel Park Zoning, Braddock Hills Zoning, Borough of Homestead Zoning, and the West Deer Township. He also served in Allegheny County as Deputy Clerk of Courts, Assistant Solicitor to the County Controller, and Prosecutor for the District Attorney Office. Mr. Knoll is active in the Boys and Girls Club of America, and has served on the board of directors of the University of Pittsburgh, as well as on the Alumni Leadership Council.

Mr. Knoll is motivated to provide high-quality medicine to under-served constituents, such as veterans, and to provide employment opportunities to single parents, the handicapped, and other people ignored by the job market. His personal connection to marijuana stems from his experience with a relative who had cancer. Even though this relative knew that marijuana would ease her pain and suffering, she refused marijuana since it was not legal in Pennsylvania. He intends to ensure that other patients suffering from intractable pain will have marijuana as an alternative or complementary therapy.

Morgan Carr, Chief Operating Officer: To bolster CMA’s Pennsylvania-based leadership with experience from the medical marijuana field, the company has recruited Morgan Carr to serve as COO. Mr. Carr has been a leader and innovator in the state-regulated medical marijuana industry since Colorado adopted regulations in 2010. He is the founder and president of MMST, LLC (DBA Wellspring), a vertically integrated business with both cultivation and dispensary operations in Denver, Colorado. He has been operating Wellspring since 2009 and has also helped build a medical marijuana company in Nevada.

Wellspring’s operating procedures are best-in-class and formed the basis for the Denver Department of Environmental Health’s 2010 “Best Management Practices: Commercial Medical Marijuana Cultivation Operation” manual, which focused primarily on odor mitigation, energy consumption, water quality and conservation, and safe disposal of fertilizers, insecticides, and other nutrients. Mr. Carr’s system has a very shallow environmental footprint and produces a premium marijuana product of consistent strength and purity. His primary objectives are to efficiently operate growing facilities, and to develop unique strains of medical marijuana to meet patient needs.

Mr. Carr is well-respected within the medical marijuana industry and is sought out by regulators for insight and advice on regulatory issues. He was the founder of the non-profit Medical Marijuana Industry Group as well the Cannabis Business Alliance. Mr. Carr’s philosophy on the business of medical marijuana is to promote sensible, workable regulations, and to educate and consult medical marijuana patients to achieve the best results for them.

Dr. Lalit Chordia, Ph.D., Director of Processing: CMA will bring to Pennsylvania’s medical marijuana market the most advanced extraction-related innovation and technology, resulting in the highest quality products for patients. The extraction team will be led by Dr. Lalit Chordia, who, for the last 30 years, has pioneered R&D in and commercial applications of supercritical fluid technology, a green materials processing technology. In 1982, while earning his doctorate at Carnegie Mellon University, Dr. Chordia co-founded his first company, Suprex Corporation, in Pittsburgh. The vision of Suprex was to commercialize the nascent technology of supercritical fluids, and the company focused on small-
scale, analytical supercritical fluid instrumentation. After gaining eight years of process and equipment R&D experience, Dr. Chordia left Suprex in 1990 and formed Thar Technologies. This enabled him to capitalize on the growing market for larger-scale supercritical fluid systems and process development services.

Through his technological and commercial leadership, Dr. Chordia has taken Thar from one employee to a global leader in its field. This transformation has led to the creation of several spin offs, including Thar Instruments, which in 2009 was sold to the Waters Corporation, a publicly-traded world leader in scientific instrumentation; Thar Pharmaceuticals, a drug development company; Thar Process, a designer and marketer of process scale supercritical fluid technology; Thar Energy, a developer of alternative, green energy technology such as advanced biofuels; and Thar Geothermal, a developer of high-efficiency, green heating and cooling technologies. Over the years, Thar has applied its supercritical fluid process and equipment technologies to natural pharmaceutical and spice extraction, drug purification and design, coatings, and many other products and processes.

Dr. Tom Krivak, Medical Director: CMA – or any other medical marijuana provider – will not succeed financially if it is not fully committed to serving the needs of Pennsylvania patients. To provide leadership in this area, CMA has recruited Dr. Thomas Krivak, M.D., to serve as the company’s Medical Director. Dr. Krivak has been a board-certified practitioner in Pennsylvania and West Virginia for fifteen years and he is a recognized expert in the field of gynecologic oncology. Dr. Krivak has authored many articles and book chapters and has been awarded more than $1.2 million in research grants.

Dr. Krivak’s career has been focused on women’s health and his research is focused on women with cancers, primarily ovarian and cervical, and quality of life issues. Dr. Krivak also interned and did his residency training at David Grant Medical Center at Travis Air Force Base and received two fellowships to train at Walter Reed Army Medical Center and the National Cancer Institute. His experience at these two military facilities will be of great value to CMA, as we endeavor to help alleviate the pain and suffering of veterans in Pennsylvania.

Dr. Krivak sees great potential in medical marijuana as a complementary therapy for patients with cancer and other conditions. In addition to providing oversight for CMA’s medical marijuana program, Dr. Krivak seeks to work closely with hospitals, health providers, and others in the medical field to educate them on the potential application of medical marijuana to multiple conditions and to develop potential research partners to investigate the efficacy of medical marijuana for various serious health conditions.

Dr. Krivak is currently Associate Director, Division of Gynecologic Oncology at Western Pennsylvania Hospital (Pittsburgh) and Clinical Professor, Department of Obstetrics and Gynecology at Temple University (Philadelphia).
**Luke Paul, Director of Facilities:** Mr. Paul has more than 20 years of experience supervising production processes and operations at P.E.I. He has served as general manager for P.E.I. and is responsible for maintaining compliance with all safety, quality and environmental standards at the facility. Mr. Paul previously was a partner and operations manager of Loud Performance Products and an owner and manager at Nevada Ltd. At Nevada Ltd, Mr. Paul cultivated relationships with tenants, managed lease details with the Bureau of Land Management in Nevada, and facilitated major building renovations of office space. His experience in these previous roles will ensure that he is prepared to manage the range the Director of Facilities responsibilities, from overseeing the functioning of the building systems to supervising all contractors doing repairs or renovation projects.

**Heather Broman, Director of Information Technology:** Ms. Broman has spent the last five years in the tech industry, with experience in process management consulting and technology analysis and design. Since 2013, she has worked for BusinessForward in Pittsburgh, where she has led the effort to document and design several business process-based initiatives, primarily within the technology departments, of 10 different Fortune 500 Companies. Ms. Broman will serve a critical role in ensuring that CMA’s IT systems, including its seed-to-sale tracking software, operate efficiently and effectively.

**Our cultivation and processing facility**

One of the keys to our financial success will be the speed with which we initially get our products to market. To this end, CMA has purchased 21,000 square feet facility in Armstrong County to ensure that upon award of a license we can expeditiously commence operations to meet medical marijuana patient demand. Significantly, CMA has already received a zoning permit from North Buffalo Township to cultivate and process medical marijuana on this property. CMA was also issued a Certificate of Occupancy by the North Buffalo Township Building Inspector, Fred Dzugan, for the location with permission to use the structure for growing and processing medical marijuana. The work CMA has undertaken to obtain local approval will not only benefit our business, but will enable us to provide patients with medical marijuana as quickly as possible.

The facility was purchased from a government agency and has both a state-of-the-art HVAC system that can be used immediately for cultivation, as well as its own on-site power generation. We also intend to install solar panels to further minimize our environmental impact. The facility occupies seven acres of land that will be scalable so that CMA can increase supply and manufacturing capability based on market dynamics.

Our goal is to provide access to high-quality medical marijuana to patients in the 11-county Health District Region in southwestern Pennsylvania. We estimate that there are over 2.7 million residents
within the 11-county region and a potential patient base of 34,000 people. Our strategic locations for dispensaries in Allegheny, Westmoreland, and Beaver counties will take advantage of public transportation transit centers to allow easy access by all patients. They will also be spread throughout the region so that a limited number of patients must drive more than 75 miles to reach a dispensary.

Our grower/processor facility, along with our dispensaries in three locations throughout the region, will provide employment opportunities for many people and make significant economic contributions in the communities we serve. In fact, our commitment to our future employees is evidenced by the fact that we have already signed a neutrality agreement with the United Food and Commercial Workers union (Local 23). Overall, we expect our grower/processor facility will create about 50 living wage jobs with health insurance and benefits.

Employing innovations
Anyone involved in the medical marijuana industry will tell you that the key to running a successful operation is an unwavering commitment to legal and regulatory compliance. CMA takes compliance seriously and is partnering with Denver-based Vicente Sederberg law firm to implement best management practices across all of CMA. Vicente Sederberg has advised hundreds of clients, in Colorado and throughout the U.S., on how to run compliant marijuana businesses since the beginning of marijuana regulation in this country. Their dedicated staff includes former regulators and advocates who have shaped the modern landscape of medical marijuana law.

To underscore CMA’s commitment to compliance and the involvement of Vicente Sederberg, Brian Vicente, Esq., one of the founding partners of the law firm, will serve as CMA’s Director of Regulatory and Compliance Affairs. Mr. Vicente has been intimately involved in marijuana reform and policy generation at the local, state, national, and international levels since 2004. He founded and has served as the executive director of Sensible Colorado, the state’s leading non-profit working for medical marijuana patients and providers. In 2010, he was elected the first-ever chair of the National Cannabis Industry Association, the only trade association in the U.S. that works to advance the interests of marijuana-related businesses on the national level. Mr. Vicente’s expertise in marijuana policy is highly sought after, and has led to him serving as an advisor to local, state, and federal governments.
A medical marijuana company needs to not only be compliant, but also responsive. Whether one is dealing with state or local officials, this is a business where questions must be answered promptly. To ensure timely and thorough response to all compliance issues—should any arise—CMA co-CEO Chuck Knoll will provide local, hands-on oversight, direction, and leadership on all compliance and regulatory issues. Mr. Knoll is a life-long resident of Pennsylvania, a practicing attorney, and has decades of experience in the public arena.

In addition to Vicente Sederberg, CMA has an operational expert in compliance in Mr. Carr, who has operated medical marijuana cultivation and dispensary businesses in Denver since 2009. Across that time span Mr. Carr’s dispensary has averaged nearly 100 patient transactions per day, resulting in over 250,000 interactions. Both businesses, cultivation and dispensary, have been fully compliant with state and local laws and regulations and his companies have never had a disciplinary action, suspension, fine, or citation raised by regulators, neighboring businesses, or the community. CMA expects the same consistency and adherence to state and local laws and regulations from its Pennsylvania operation.

**Patient Demand, Pricing, and Financial Sustainability**

CMA’s ability and plan to maintain a successful and financially sustainable operation will be dependent in part on our insight into the potential market. While precisely calculating the exact number of medical marijuana patients in Pennsylvania is not possible, CMA is able to make projections based on an analysis of other medical marijuana states with recently implemented programs (Nevada and Massachusetts), those with similar numbers and types of conditions (New Mexico), as well as with long-running programs with fewer conditions (Arizona, Oregon and Colorado). This enables CMA to project high, low, and moderate estimates of the number of people afflicted with a particular condition, and the likelihood of patients with that condition seeking medical marijuana as part of their therapy.

Our analysis, based on the experiences in other states, suggests that Pennsylvania should expect a small medical marijuana patient base at first, and then slow growth for the first two to three years after registration begins. To produce our overall estimate of potential patients, we are using the US Census 2015 estimate of Pennsylvania’s residential population: approximately 12,802,503 individuals. An epidemiological model used to estimate the prevalence of medical marijuana qualifying conditions in the state shows that a maximum of 6,650,943 residents are eligible to participate in the medical marijuana program. (Note: This estimate counts potential patients multiple times if they qualify for medical marijuana based on multiple qualifying conditions. A lack of solid data on the co-occurrence of each qualifying condition limits our ability to remove this double counting. Because a similar issue exists for each state, the comparison epidemiological model takes this problem into account to provide a corrected actual patient estimate.)

The top five conditions for Pennsylvania residents (along with an estimated number of residents affected by each condition) are:

- Severe Pain: 3,930,368
- Post-Traumatic Stress Disorder: 1,113,818
- Cancer: 690,964
- Neuropathies: 307,260
To produce patient demand for CMA, we must adjust to account for the potential market in the southwest portion of the Pennsylvania. The total population of the 11-County region is 2,715,558, with nearly half, 1,232,256 (46 percent) residing in Allegheny County. We must then factor in the percentage of residents who typically become medical marijuana patients, based on other states’ experiences. (We estimate that peak registration will end up being approximately 1.25% of the population.) Based on these factors, and with the aforementioned ramp-up period in mind, we modeled the following patient registrations over the first four years of medical marijuana legalization in Southwestern Pennsylvania:

End of Year 1 – Patient range: 3,215 (low estimate) to 4,311 (high estimate)
End of Year 2 – Patient range: 7,976 (low estimate) to 12,501 (high estimate)
End of Year 3 – Patient range: 13,494 (low estimate) to 22,785 (high estimate)
End of Year 4 – Patient range: 19,793 (low estimate) to 34,123 (high estimate)

**Pricing**

Similar to our estimates of patient demand, our estimates of likely prices for medical marijuana are informed by functioning markets in other states with regulated medical marijuana markets. We used point-of-sale data from BDS Analytics, a cannabis business intelligence and market tracking company. BDS Analytics has tracked over 100 million legal marijuana transactions and we were able to capture real-time prices for marijuana transactions for legal, medical marijuana sales. Using data for the allowable products in Pennsylvania provides the following information:

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<tr>
<th>Product Category</th>
<th>Market Share (%)</th>
<th>Average Monthly Patient Expenditures ($)</th>
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<tbody>
<tr>
<td>Ingestibles (pills, gel caps)</td>
<td>5.2</td>
<td>3.95</td>
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<tr>
<td>Topicals (salves, creams)</td>
<td>3.2</td>
<td>2.41</td>
</tr>
<tr>
<td>Vaporizable oils</td>
<td>80.3</td>
<td>61.11</td>
</tr>
<tr>
<td>Vaporizable cartridges</td>
<td>7.9</td>
<td>6.03</td>
</tr>
<tr>
<td>Accessories (device, apparel, etc.)</td>
<td>3.5</td>
<td>2.65</td>
</tr>
<tr>
<td><strong>Total</strong></td>
<td><strong>100.0</strong></td>
<td><strong>$76.14</strong></td>
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We used the value of $76.14 for average monthly medical marijuana patient expenditures in our financial models as the best approximation for prices in Pennsylvania’s newly legal medical marijuana market. That is the retail price, which assumes a 100 percent mark-up by the dispensary. Note also that while nearly ninety percent of the expected expenditures will be devoted to vaporization, CMA will be providing the full array of products so that no medical marijuana patient is left behind.
A critical factor in CMA’s success, as well as an extremely important matter for potential patients in Pennsylvania, is the company’s speed to market. In this area, the company will benefit from the experience of COO Morgan Carr. In addition to operating one of the first successful dispensaries in Colorado, Mr. Carr worked closely with Sierra Wellness, a medical marijuana cultivator and dispensary operator in Reno, Nevada, as it became the first cultivation facility in the state to obtain full approval to operate. They achieved this milestone by proactively sketching out an internal timeline and then hitting the deadlines they had set. Steps included finalizing architectural drawings during the application processes, meeting with the local building department soon after obtaining a preliminary license, and installing seed-to-sale tracking software early so that company leaders could demonstrate its functionality to inspectors. Their efforts were so thorough, they ended up educating the inspectors for future inspections.

CMA knows from prior experience in this industry that success is dependent upon owner involvement, rigorous recruitment of employees who share their values, intense and thorough training of employees, instilling a patient-centric mindset in employees, operational excellence, strong community relationships, productive relationships with medical care providers, and significant resources devoted to a start-up. There are also some key milestones that must be met in order to assure success.

The first milestone will be securing a license from the Commonwealth to cultivate, manufacture, transport, and dispense medical marijuana. All large expenditures—the build-out of cultivation and production facilities in Armstrong County; securing retail locations for dispensaries in Allegheny, Beaver, and Westmoreland County; build-out of those facilities; purchase of transport vehicles and GPS systems; employee recruitment and training—hinge on license approval. Once that goal is achieved, our milestones are aggressive and CMA has the capital and expertise to rapidly get to market after securing a license from the Commonwealth.
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<td><strong>Occupation:</strong> Owner/President</td>
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<td><strong>Also known as:</strong> Tip Paul, T. Hays Paul</td>
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<td><strong>Occupation:</strong> Attorney</td>
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<td><strong>First Name:</strong> Barry</td>
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<td><strong>Occupation:</strong> Police Officer</td>
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Pennsylvania Department of Health
Medical Marijuana Grower/Processor Permit Application

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Fax: [REDACTED] Email: [REDACTED]

IF MORE SPACE IS REQUIRED, PLEASE SUBMIT ADDITIONAL INFORMATION ON OTHER OFFICERS IN A SEPARATE DOCUMENT TITLED “CURRENT OFFICER (Contd.)” 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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**Partner Type:**
- □ General/Full Partner
- □ Limited Partner
- □ Dormant/Silent Partner
- □ Other: 

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<th>Percentage of ownership:</th>
<th>Partnership participation from: MM/DD/YYYY</th>
<th>Description of participation in operation of the applicant:</th>
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**Name and Residential Address**

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<th>Suffix:</th>
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<tr>
<td>Occupation:</td>
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**Partner Type:**
- □ General/Full Partner
- □ Limited Partner
- □ Dormant/Silent Partner
- □ Other: 

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<th>Partnership participation from: MM/DD/YYYY</th>
<th>Description of participation in operation of the applicant:</th>
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**IF MORE SPACE IS REQUIRED, PLEASE SUBMIT ADDITIONAL INFORMATION ON OTHER PARTNERS IN A SEPARATE DOCUMENT TITLED “INTEREST OF OTHER PARTNERS (CONTD.)” IN ACCORDANCE WITH THE ATTACHMENT FILE NAME FORMAT REQUIREMENTS AND INCLUDE IT WITH THE ATTACHMENTS.**

---

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

---

[Department of Health Logo]
Pennsylvania Department of Health  
Medical Marijuana Grower/Processor Permit Application

LIST ANY OTHER PERSONS HOLDING AN INTEREST IN THE PROPOSED SITE OR FACILITY, THAT ARE OTHERWISE NOT DISCLOSED IN SECTIONS A OR B.

<table>
<thead>
<tr>
<th>Name and Residential Address</th>
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<tbody>
<tr>
<td>First Name: Brian</td>
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<tr>
<td>Middle Name: Peter</td>
</tr>
<tr>
<td>Last Name: Vicente</td>
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<tr>
<td>Suffix: N/A</td>
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<tr>
<td>Occupation: Attorney</td>
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<tr>
<td>Title in the applicant’s business: Director of Regulatory &amp; Compliance Affairs</td>
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<tr>
<td>Also known as: N/A</td>
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<tr>
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First Name:  
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Last Name:  
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Title in the applicant’s business:  
Also known as:  
Date of birth: **REDACTED**  
Address Line 1:  
Address Line 2:  
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City:  
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Zip Code:  
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Email:  
Nature, type, terms and conditions of the interest in the applicant:

Name and Residential Address

First Name:  
Middle Name:  
Last Name:  
Suffix:  
Occupation:  
Title in the applicant’s business:  
Also known as:  
Date of birth: **REDACTED**  
Address Line 1:  
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Address Line 3:  
City:  
State:  
Zip Code:  
Phone:  
Fax:  
Email:  
Nature, type, terms and conditions of the interest in the applicant:

Name and Residential Address

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Last Name:  
Suffix:  
Occupation:  
Title in the applicant’s business:  
Also known as:  
Date of birth: **REDACTED**  
Address Line 1:  
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State:  
Zip Code:  
Phone:  
Fax:  
Email:  
Nature, type, terms and conditions of the interest in the applicant:
Pennsylvania Department of Health
Medical Marijuana Grower/Processor Permit Application

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:

It is unlikely that the leadership team of any applicant for a medical marijuana license in Pennsylvania will be more dedicated to having a positive impact on the community than the leaders of Commonwealth Medical Alternatives (CMA). This is because the leaders of CMA are part of the fabric of the community in which they will operate. As described in greater detail in Section 24, the company
is led by individuals who have been educated, built highly successful businesses, treated cancer patients, served local governments as legal counsel, dispensed medicine in pharmacies, and protected the public – all in southwest Pennsylvania. CMA is more than just a company; it is a collaborative effort of community leaders intended to improve the lives of community members.

CMA is committed to being a responsible neighbor and developing and maintaining a positive impact in the North Buffalo Township and Armstrong County community. We will do this by keeping the lines of communication open and listening to the community. Our plan must be grounded in trust and mutual benefit in order to be effective. CMA is committed to not just addressing and eliminating any potential negative impacts on the community in which we operate, but also to improving the surrounding community.

Our community impact plan includes:

- Conducting community outreach and education
- Holding education seminars for patients and members of the public
- Maintaining professional business practices
- Buying/Hiring locally and from diverse groups
- Volunteering time and contributing resources

In our planned community meetings, we will emphasize our desire to have a positive and lasting relationship with our immediate community. The plan and its components, as described below, have already been successful in addressing the concerns of local leaders and securing many supporters and advocates for the vital services we will be providing.

Informing neighboring businesses and the community at large about our business operations, the safety and security of our facility, and the accountability we accept for our products is the proactive approach we will take. We have established strong relationships and partnerships with many business leaders, local elected officials, and community leaders. We are reaching out to them as well as to new groups, businesses, and officials to listen to their concerns, answer questions, solicit their input, and offer solutions.

**Engagement with Local Officials**

In North Buffalo Township, the principals of CMA have purchased a former manufacturing facility that has been closed for more than 10 years to use as a medical marijuana grower/processor facility. CMA has reached out to local officials to inform them of our intentions and answer any questions or concerns they may have. CMA’s Co-CEO, Mr. Chuck Knoll, submitted an application for zoning approval and was granted a zoning permit from the North Buffalo Township Zoning Officer. CMA was also issued a Certificate of Occupancy by the North Buffalo Township Building Inspector, Fred Dzugan, for the grower/processor location with permission to use the structure for growing and processing medical
marijuana. CMA has taken the necessary steps to obtain local approval in order to be able to provide patients with medical marijuana as quickly as possible.

CMA has also met with and spoken to the Chief of Police of the North Buffalo Police Department, Jason Huffhand, and the Chairman of the Public Safety Committee of North Buffalo Township, David Wolfe. Mr. Huffhand and Mr. Wolfe met with the principles of CMA and went over CMA’s security plan. Both Mr. Huffhand and Mr. Wolfe wrote a letter to offer their support to CMA to operate a grower/processor facility in North Buffalo Township. This letter stated that they, “found this group dedicated to helping qualified patients in a safe and secure environment. Their thorough safety & security plan will deter theft, diversion, and unauthorized entry. CMA is eager to work with law enforcement and the community to address concerns about safety or security issues. CMA has pledged to become a respectful and supporting member of the community, and their group has the business expertise to become a success. As a local business their facility will provide long-term jobs to our community and quality medicine alternatives to some of our most vulnerable citizens. I am in full support of their plan to open a grower/processor facility in our community, and I’d like to endorse their application.” This endorsement does not in any way represent the end of our engagement with local law enforcement and public safety officials. CMA pledges to work in coordination with local law enforcement to address any safety or security issues that may arise in the future, as described in detail below.

CMA has reached out to a number of additional local officials and organizations to inform them of our business, address any questions or issues, and ask them for their support. For over a year, leaders of CMA have met with and discussed our business with community stakeholders. Our Co-CEO, Mr. Tip Paul, spoke with Joe Pittman, Chief of Staff of Senator Don White. Mr. Paul introduced the company and offered to meet with the Senator to explain CMA and our intentions to locate in Armstrong County. Though Senator White thought it was not appropriate to meet with applicants prior to permits being awarded, he suggested other parties to whom we could reach out. Mr. Paul and Mr. Knoll met with the Armstrong County Commissioners, Jason Renshaw, George Skamai, and Pat Fabian, to introduce CMA and inform them about our intentions to apply for and, if successful, open a grower/processor facility in Armstrong County. CMA pledges to be available to the County Commissioners and be available for any questions for constituents. The County Commissioners were receptive to our proposal and wished us luck.

We intend to follow up on other suggestions and advice received in meetings with community leaders and pursue further outreach. There are many other groups and businesses to contact in order to invite them to learn more about who we are and the services we will provide through our operations. We want the community to feel comfortable and secure in knowing who we are and what we do. Our operation platform is to be transparent and welcoming as we work to build upon the local economic base, and be an active community member.

Educating the Community
We plan on holding regular general education sessions that will be open to patients, caregivers, and interested members of the community. These sessions will include topics such as:

- How to administer products
- Strain and product education
- How to best preserve your medication (prevent spoilage or staleness)
- Best practices for safely and securely transporting your products home
- Best practices for safely and securely storing your products at home
- General wellness tips and suggestions
- Referrals to local community services, resources and support groups for related medical conditions

We will invite guest presenters from the local medical community, law enforcement, and other neighborhood groups and community based experts. Community involvement and participation in these sessions is a valuable way to build trust and open lines of communication. Giving back, volunteering time, and contributing resources is core component of CMA's mission. We are also seeking to establish relationships with local groups and civic organizations, such as:

- Local advocacy and support groups representing patients with the conditions and diseases covered under the medical marijuana law;
- Disability groups;
- Veterans groups;
- Senior Citizen groups;
- Community development corporations;
- Local business associations;
- Faith based organizations; and
- Other charitable enterprises.

Providing Benefits to the Community

CMA is committed to supporting members of the local community by focusing on access to basic necessities that many of us often take for granted, including clothing and food. Through direct giving, ongoing food and clothing drives we plan on establishing in our company, as well as meal preparation several times a month, CMA can assist local residents by providing nutritious meals and other basic needs. CMA plans to partner with local grassroots organizations, such as the Armstrong County Community Action Agency with their food bank program.

CMA’s commitment to contributing to the overall welfare of the community will apply to everyone, including those without a home. CMA plans to contribute supplies and time to local organizations, churches, and missions providing programs for feeding the homeless. CMA plans to implement a new donation drive at least once per quarter.
CMA is dedicated to helping veterans and educating them on medical marijuana. To that end, CMA has created a brochure that gives basic information on medical marijuana, how to become a patient, and educational resources. We will work with veterans’ organizations to distribute this brochure. Our commitment to veterans was evident in a letter of support we received from Adjutant Phillip Diana of Pittsburgh Firefighters Post 509. He wrote, “I found the principals of CMA to be conscientious businessmen who have a sincere interest in benefiting the veterans of Pennsylvania challenged by health issues. I was pleased to hear that CMA has a thorough security plan and that they have plans to work with law enforcement and the local fire departments regarding safety issues. As a veteran and board member of the Pittsburgh Veteran Firefighters Association, CMA has my endorsement.” CMA has presented our background with Brent Johnson, Commander of the American Legion of District 36, who wrote a letter of support for CMA. He wrote, “As the nation’s largest wartime veterans service organization, we have a devotion to our fellow service members and veterans. CMA appears dedicated to helping qualified patients in a safe and secure environment, and has assembled an impressive medical team. I expect them to provide long term jobs to our veterans and our community as a local grower/processor. The dispensary facilities will provide high quality medicine to some of our most vulnerable citizens. CMA will meet a growing need among patients in our state who suffer needlessly. I endorse their desire to open a business in the Pittsburgh area and will gladly share in their success.”

One area of concern for some local officials and residents is drug awareness and prevention. In order to be proactive in this area, we met with Karen A. Plavan, Ph.D., Executive Director of the Oasis Recovery Center, to see how CMA can be helpful. Dr. Plavan has written a letter of support for CMA’s application and reviewed our business model and veterans’ brochure. Dr. Plavan wrote, “After careful consideration, I highly recommend that the application submitted by CMA be granted by the Commonwealth of Pennsylvania to operate a medical marijuana business. I believe that CMA will meet the highest ethical standards required for this type of business operations.” Our Co-CEO, Mr. Paul, has supported the work at the Oasis Recovery Center, which has helped many people suffering from addiction. Mr. Knoll has also represented many individuals facing criminal charges due to addiction. We hope that we can work together with Dr. Plavan to help address addiction and drug issues in our community.

**Communicating with the Community**

CMA will have a variety of channels of communication to receive feedback from community members. CMA will maintain a website that will be updated frequently to reflect changes to the facility. Featured on the website will be a ‘Contact Us’ module with an email form and a 24-hour hotline number. Our Human Resources Manager will serve as an on-site community relations liaison will be responsible for updating the website, responding to emails, and maintaining the hotline. All communication and feedback will receive a timely and positive response. CMA pledges to be available and responsive to any feedback, concerns, and questions.
CMA intends to continue to listen, share knowledge, and create an understanding of our services, objectives, and planned outcomes. CMA will meet frequently with public officials, members of the general public, and stakeholders so that company representatives can hear about any issues or concerns related to the facility. If necessary, CMA will establish an action plan and a reporting arrangement to ensure the community is informed about facility-related developments. CMA hopes to work with the local government to formally schedule semi-annual gatherings to listen to the community.

CMA will make available contact information for our Human Resources Manager, as an on-site community liaison to serve as a liaison to the community. The Human Resources Manager will be responsive to complaints and concerns and will serve as the point of contact with the local police, fire, and EMS providers. CMA will provide the Police Department and all residents, businesses, and property owners within 100 feet of the facility the current name, phone number, secondary phone number, and email address of our Human Resources Manager to whom notice of any operating problems associated with our business may be reported. CMA will also provide the name, phone number, and email address of our on-site Director of Security to the Police Department. Open communication and dialogue will enhance our commitment to having a positive community impact.

CMA’s commitment to communication, as well as prompt action, extends to situations in which problems arise. Product complaints and recall procedures will be executed in compliance with all requirements. Outside of those provisions, it is our intention to resolve any complaints from our neighbors in a timely manner and in a way that satisfies all impacted parties. We will ensure that all authorities, as well as our immediate neighbors, have up-to-date direct contact information for our management team. Additionally, we will provide general contact information on our website. Any complaints or investigations by the State, law enforcement, or local officials will be handled by the CEO immediately. It is our policy to comply with all mandates from these agencies. Due to our intensive odor mitigation plan, we do not anticipate complaints related to the operation’s aroma. Other complaints may arise from normal business operations including employee loitering, parking, or other facility-related issues. Our policies will require that any staff member receiving a complaint report it to their manager immediately. The manager will respond to the complainant and perform any investigation necessary as soon as possible. All necessary actions will be taken to resolve a complaint.

Creating a Diverse and Respected Workforce

CMA is passionately committed to benefitting our local community and will be a source of job creation. Hiring locally is key component to our staffing plans and to being a community partner. CMA will provide every opportunity for Armstrong County residents to apply for jobs. CMA will post job listings through local outreach, advertising in the Kittanning Paper, and contacts with local job centers such as PA Careerlink. We also plan to utilize local companies in the design, development, and construction of the facility, as well as local trade services for all infrastructure needs (HVAC, electrical, plumbing, etc.)
And we will endeavor to utilize women- or minority-owned businesses, as detailed in our Diversity Plan in Section 3. Beyond direct contact with diverse organizations, CMA intends to promote employment opportunities to diverse populations within the broader Pittsburgh MSA, through social media, radio, and print.

CMA’s commitment to diversity is exemplified by the involvement of Amy Dannemiller as the company’s Director of Diversity & Inclusion. Mrs. Dannemiller, more commonly known by her brand name of ‘Jane West,’ is the founder and Board chairwoman of Women Grow, an organization created to connect, educate, inspire, and empower the next generation of cannabis leaders by creating programs, community, and events for aspiring and current business executives. Founded in 2014, Women Grow serves as a catalyst for women to influence and succeed in the cannabis industry. Mrs. Dannemiller has previously served as senior events manager, director of operations, and domestic outreach manager for multiple companies and campaigns. She has a Master’s Degree in Social Work and Community Outreach Specialization from Denver University.

As the Director of Diversity & Inclusion, Mrs. Dannemiller will implement, maintain, and direct CMA’s diversity goals by ensuring that each employee is an integral part of the company’s success and that the company follows the principles of diversity and equal opportunity. She will chair the Diversity Committee, which will be responsible for setting and advancing the company’s diversity and inclusion strategy. This will include developing talent at all levels of the company that exceeds the cultural and ethnic diversity characteristics of the region; supporting the local economy through purchasing goods and services from a diversified group of vendors, contractors, and professional service providers; conducting outreach efforts to patients across the region that embraces all ethnicities; increasing cooperation, collaboration, and team-building among employees; and enhancing the communities in which we operate.

CMA will endeavor to adopt environmentally friendly business practices and will, of course, comply with OSHA and other employee workplace standards. CMA plans to provide living wages, health care coverage, and retirement and education benefits for our employees. We have obtained a State Workmen’s Insurance policy so that our employees are covered from Day One. We will also offer flexible schedules, so that we can provide employment opportunities to single parents.

CMA has signed a Neutrality and Card Check Agreement with United Food and Commercial Workers International (UFCW), a trade union with a membership of 1.3 million workers. CMA will utilize UFCW to ensure the quality of employment for our employees. The agreement states that CMA agrees to remain neutral on union representation, union representatives are allowed to speak with employees during non-working time, the union will conduct a meeting with all of CMA’s employees, and a collective bargaining agreement will be negotiated. We support the UFCW’s efforts to expand workers’ standard of living and benefits and believe that secure, well-paid jobs where employees are treated well will lead to a stable company and a superior level of care to our patients. We believe that satisfied employees will become stewards of CMA, the community, and our patients.
The principals of CMA have been allies with the Allegheny County Labor Council President, Jack Shea, for decades. CMA shared our business plan and veterans’ brochure with Mr. Shea and he wrote a letter of support for CMA. Mr. Shea wrote, “I find their diligence to be very impressive. Based on this, I recommend that the CMA application be granted, and the requested permit be issued under SB3.”

How our employees are treated is a reflection on the community and we maintain the highest standards in staffing and employment principles. We intend to work with local financial institutions as they become available to handle all of our financial affairs in state. By employing a professional workforce in a pleasant workplace environment, we hope to retain staff and avoid high turnover rates. This stability will help ensure our successful operations, which will then allow us to be long-term contributors in the community.

CMA will also provide qualified applicants and employees who are disabled with needed reasonable accommodations, as required by law, and will ensure that all employment decisions are based only on valid job requirements. As part of our commitment, our Armstrong County cultivation / processing facility was purchased, in part, because it is ADA compliant, and we are designing our cultivation rooms to be able to accommodate persons in wheelchairs and those with other disabilities.

*Minimizing negative impacts*
Adding Value to the Community

We pride ourselves on being good stewards of the local business community. We will look to not only reflect the current streetscape, but also enhance and beautify the surrounding area. Maintaining a neat and tidy facility that positively reflects the community can help breathe new life into an area. Working with our neighbors we can help to further revive and reinvigorate the area. We will take steps to discourage and correct objectionable conditions that constitute a public or private nuisance in parking areas, sidewalks, alleys, and areas surrounding our business and adjacent properties. This includes prohibiting smoking, creating a noise disturbance, loitering, littering, and graffiti. CMA expressly prohibits any marijuana use in or around the business, including smoking, consumption, ingestion, or other uses.

CMA also pledges to be a professional operation. The facility shall be designed to mimic the design and character of the neighborhood. Exterior signage will comply with all signage requirements, be discrete, and will not depict any images or references to marijuana. All CMA employees will lead by example by maintaining a professional appearance and attitude.

Medical marijuana businesses have an obligation to the health and well-being of their patients as well as the communities in which they operate. It is a principal goal of CMA to be a good corporate citizen in Pennsylvania and Armstrong County. We believe this goal requires a direct relationship with not only community authorities, but also its residents. It is our intention to be a contributing, positive force in the community and to assist in changing the perception of those associated with the medical use of marijuana. Armstrong County has a rich history, one that CMA intends to honor and enrich through our charitable contributions. As a philanthropist, Mr. Paul helped direct $10,000 each in charitable donations to three Armstrong County Charities: the Armstrong Indiana Clarion Drug and Alcohol Commission, the Progressive Workshop of Armstrong County, and the Community Foundation of Kittanning. As a business owner, Mr. Paul recognizes the value of a healthy workforce and the resulting positive impact jobs will have on the community.

Mr. Paul also contributes to numerous philanthropic organizations in Pittsburgh, both with donations and with direct involvement. In his work with Catholic Charities, Mr. Paul helps immigrants and refugees to learn English and understand American culture so that they can become employed. Other CMA leaders are similarly civic-minded and have a history of extensive community engagement. Mr.
Knoll is a long-time contributor to the Boys and Girls Club, past board member of the University of Pittsburgh, and contributes to Orchard Performing Arts Company. Dr. Chordia is a member of the Board of Trustees of Children’s Hospital of Pittsburgh Foundation, an active contributor to Carnegie Mellon’s Robotics program, and on the Steering Committees of Sustainable Pittsburgh, an organization focused on addressing economic, social equity, and environmental needs.

Our community outreach plan demonstrates how we can fulfill our responsibilities and achieve those goals. We look forward to a long and beneficial relationship between our CMA and our community.

CMA takes very seriously the responsibility it has to be a beneficial addition to the community. Providing preeminent products for patients, participating in community enrichment activities and working together to improve our community is fundamental to CMA and will be the foundation of the success of our operations. CMA recognizes that our presence may directly affect our community. We are committed to being a welcomed and a vital part of the community by making our impact positive and beneficial.
Attachment A: Signature Page

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

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

<table>
<thead>
<tr>
<th>Yes</th>
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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.
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

Chuck Knoll Co-CEO

Date

3-13-17

Printed Name

Chuck Knoll
**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: | Commonwealth Medical Alternatives, LLC |
| Trade names and DBA (doing business as) names: | N/A |
| Principal Business Address: | 100 Grant Street |
| City: Munhall | State: PA | Zip Code: 15120 |
| Phone: | Fax: | Email: |
TO ALL WHOM THESE PRESENTS SHALL COME, GREETING:

COMMONWEALTH MEDICAL ALTERNATIVES, LLC

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

Creation Filing filed on Mar 17, 2016 - Pages (2)

which appear of record in this department.

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

Secretary of the Commonwealth

Certification Number: TSC170130141631-1

Verify this certificate online at http://www.corporations.pa.gov/orders/verify.aspx
PENNSYLVANIA DEPARTMENT OF STATE  
BUREAU OF CORPORATIONS AND CHARITABLE ORGANIZATIONS  

☐ Return document by mail to:  
CORY C. OMASTA, ESQ.  

Name  
420 FORT DUQUESNE BOULEVARD, 16TH FLOOR  
Address  
PITTSBURGH PA 15222  
City State Zip Code  

☐ Return document by email to:  

Read all instructions prior to completing. This form may be used for Fee: $125  

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

1. The name of the limited liability company (designator is required, i.e., "company", "limited" or "limited liability company" or abbreviation):  
COMMONWEALTH MEDICAL ALTERNATIVES, LLC  

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

(a) Number and Street City State Zip County  
100 GRANT STREET MUNHALL PA 15120 ALLEGHENY  

(b) Name of Commercial Registered Office Provider County  

(c/d):  

3. The name and address, including street and number, if any, of each organizer is (all organizers must sign on page 2):  
Name  
CORY C. OMASTA, ESQ.  
Address  
420 FORT DUQUESNE BOULEVARD, 16TH FLOOR PITTSBURGH, PA 15222  

TC0160322F2176  

Date Filed: 03/17/2016  
Pedro A. Cortés  
Secretary of the Commonwealth
4. **Strike out if inapplicable term**
   A member's interest in the company is to be evidenced by a certificate of membership interest.

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

6. **Strike out if inapplicable**
   The specified effective date, if any is: ________________
   (MM/DD/YYYY and hour, if any)

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

8. **Strike out if inapplicable**
   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 _______ day of ________, 2016.

__________________________
Signature

__________________________
Signature

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

Instructions:
- Attach one of the following:
  o Evidence of the applicant’s clear legal title to or option to purchase the proposed site and facility
  o 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
  o Other evidence that shows that the applicant has a location to operate its medical marijuana organization
- Complete this cover sheet. Scan this sheet and the appropriate document(s) and save it as a PDF file called “Attachment C,” using the appropriate file name format

| Business Name, as it appears on the applicant’s certificate of incorporation, charter, bylaws, partnership agreement or other official documents: | Commonwealth Medical Alternatives, LLC |
| Trade names and DBA (doing business as) names: | N/A |
| Principal Business Address: | 100 Grant Street |
| City: Munhall | State: PA | Zip Code: 15120 |
| Phone: | Fax: | Email: |
COMMERCIAL LEASE (the “LEASE”)

MADE this __17__ day of March 2017, by and between CV Realty Holding, LLC, with its principal address at 100 Grant Street, Munhall, PA 15120 hereinafter called "LESSOR" and Commonwealth Medical Alternatives, LLC with its principal address located at 100 Grant Street, Munhall, PA 15120, hereinafter called "TENANT".

1. **DEMISE AND TERM:** LESSOR, hereby leases to TENANT for the term of one (1) year (the “INITIAL TERM”) commencing on the first (1st) day of March, 2017 the following described premises in its present and "as is" condition:

   1676 Freeport Road
   Kittanning, PA 16201

   (The "PREMISES"), which includes the entire building and lot.

1.1. **OPTION TO RENEW:** Tenant shall have and is hereby granted two (2) options (individually an “Option”) to extend this Lease beyond the Initial Term for an additional period of five (5) years each (individually an “Option Period”), upon the same terms, covenants and conditions and rental as set forth herein. Tenant may exercise each Option successively by giving written notice to Landlord not less than two (2) months prior to expiration of the Initial Term of the Lease or an Option Period. Tenant shall not have the option to extend the Term of this Lease if Tenant is in default under any provision of the lease as to which Lessor has given notice thereof pursuant to this Lease.

1.2 **RIGHT TO TERMINATE:** In the event that Tenant is unable to obtain the state permits and/or licenses for the growth and production of medical marijuana, Tenant may terminate the Lease.
2. **RENT:** The TENANT covenants to pay as Rent the total sum of One Million Seventy Five Thousand Dollars ($1,075,000), payable as set forth below, in advance, in installments, without demand on or before the first day of each month at the office of the LESSOR, in monthly sums of Eighty Nine Thousand Five Hundred Eighty Four Dollars ($89,583.33).

   The TENANT shall pay all Rent when due and payable, without any setoff, deduction or prior demand therefor whatsoever. Any payment by TENANT or acceptance by LESSOR of a lesser amount than shall be due from TENANT to LESSOR shall be treated as payment on account. The acceptance by LESSOR of a payment for a lesser amount with an endorsement or statement thereon, or upon any letter accompanying such payment, that such lesser amount is payment in full, shall be given no effect whatsoever, and LESSOR may accept such payment without prejudice to any other rights or remedies which LESSOR may have against TENANT.

3. **INTEREST AS ADDITIONAL RENT:** Any provision of this LEASE to the contrary notwithstanding, TENANT shall pay as additional rent, interest at Nine Percent (9%) of the outstanding delinquent balance for any payment of Rent or Additional Rent not timely made. This charge is in addition to any other rights or remedies of the LESSOR. Interest will run at the foregoing rate following default and judgment.

4. **ADDITIONAL RENT:** TENANT shall pay as Additional Rent for the PREMISES, all gas and electricity used thereon, all garbage collection charges, all sanitary sewer charges or assessments, and all water rents assessed on the premises whether by meter rate or flat rate as due. In addition, TENANT shall pay all taxes, other than federal, state or local income taxes, payable or chargeable against the receipt of rent, such as ad valorem, personal property or business privilege or the like (property taxes are not included herein, but increases thereon are referenced in another
provision of this LEASE) within ten (10) days from the time LESSOR mails the invoice to TENANT. LESSOR may have lienable charges, such as water and sewer charges invoiced to and under the name of LESSOR, in which case TENANT shall reimburse, as Additional Rent, LESSOR within ten (10) days from the time LESSOR mails the invoice to TENANT. The first and final period of the term shall be estimated and prorated and invoiced to TENANT prior to the end of the term. On failure of TENANT to pay any of the foregoing when due, LESSOR may enforce payment thereof in the same manner as rent in arrears.

5. **CONDITION OF PREMISES; USE OF PREMISES:** TENANT accepts the PREMISES "as is" and LESSOR shall not be responsible for the condition thereof except as set forth below.

TENANT has inspected the PREMISES prior to entering into this LEASE and is satisfied with the conditions thereof. TENANT hereby agrees to maintain and keep the PREMISES during the term of this LEASE in good repair, including but not limited to water pipes, their connections and all plumbing fixtures. The TENANT also agrees to keep the PREMISES, including the common areas of the building, property of the LESSOR appurtenant thereto, and sidewalks free of rubbish and in such condition as may be required under any law or regulation applicable thereto. TENANT further agrees to keep all sidewalks free from snow and ice.

All repairs, except those specific repairs set forth below which are the responsibility of the LESSOR, shall be made by the TENANT at its own expense. If the LESSOR pays for the same or any part thereof, the charges will constitute Additional Rent payable forthwith.

TENANT further agrees not to make any alterations or improvements to the PREMISES without the consent of LESSOR, or to remove any additions or improvements whether made by the
LESSOR or TENANT, nor to post bills or erect billboards or signs, without the written consent of the LESSOR, under penalty of instant forfeiture of this LEASE and the terms hereof. If permitted to make additions or improvements, it is TENANT's sole responsibility to comply with all laws, ordinances and regulations pertaining or relating to the additions or improvements.

6. **INSURANCE:** Prior to taking possession, TENANT shall obtain and maintain general liability insurance acceptable to LESSOR in the amount of $500,000.00/$500,000.00, naming LESSOR as an additional insured. TENANT is responsible to insure TENANT improvements and property and all personal property of TENANT shall be and remain at its sole risk and LESSOR shall not be liable for any damage or loss of such personal property arising from any event whatsoever, even if the fault of LESSOR, unless such is intentional. TENANT shall pay any increase in LESSOR's insurance costs directly related to the use of said property by the TENANT. TENANT shall hold LESSOR harmless from any liability or claim for damages arising out of TENANT's obligations, covenants, and duties expressed herein.

7. **ASSIGNMENTS AND SUBLETTING:** The TENANT hereby agrees not to assign this LEASE voluntarily or involuntarily, nor to sublet the premises or any part thereof, without the written consent of the LESSOR (which may be withheld for any reason whatsoever or no reason at all), under penalty of instant forfeiture of this LEASE. Any purported assignment or subletting is void.

8. **COMPLIANCE WITH PUBLIC LAWS:** TENANT further agrees to perform, fully obey and comply with all ordinances, rules, regulations and laws of all public authorities, boards and officers relating to the operation or use of said PREMISES and the business of TENANT, or any part thereof, and TENANT shall not suffer or use the same in violation of any law, statute or ordinance, during the term of said LEASE or any renewal thereof. In case TENANT violates or fails to comply
with any law, rule, ordinance or regulation pertaining to the PREMISES, such as violations of building codes, environmental requirements, TENANT shall reimburse LESSOR for all expenses incurred, both to remediate the condition and for any costs of defense, including LESSOR's time and expenses and legal fees. TENANT shall also comply fully with all environmental and waste disposal laws, ordinances and regulations.

9. **TERMINATION; VACATING THE PREMISES:** This LEASE shall terminate at the end of the Term or any renewal thereof without the necessity of any notice from either LESSOR or TENANT to terminate the same, and TENANT hereby expressly waives all right to any notice which may be required under any laws now or hereafter enacted and in force in Pennsylvania, including The Landlord And Tenant Act of 1951, Act of April 6, 1951, as amended. TENANT covenants and agrees to give up quiet and peaceful possession without further notice from said LESSOR or agent.

10. **DEFAULT; BREACH:** It is further agreed that if the said TENANT shall default in the payment of any installment of Rent or Additional Rent; or shall remove or attempt to remove or express or declare an intention to remove any of the goods and chattels from the premises out of the ordinary course of business, or should an execution be issued against the TENANT, bankruptcy proceeding be begun by or against said TENANT, or an assignment be made by TENANT for the benefit of creditors, or a receiver appointed for TENANT, or should there be any other violation of the terms of this LEASE, then and in such case the entire Rent for the balance of the said Term shall become immediately due and payable. In case of such assignment, bankruptcy proceedings, appointment of a receiver, or of a sale on legal process of TENANT'S goods, LESSOR shall have the right to demand and receive the Rent for the balance of the Term, or renewal term which shall be first paid out of the proceeds of such assignment, bankruptcy or receiver's proceedings or sale on legal
process, any law, usage or custom to the contrary notwithstanding.

11. CONFESSION OF JUDGMENT/EJECTMENT: For value received and on any default of payment of Rent or Additional Rent or of Damages or any other sum due by TENANT, TENANT does hereby empower any attorney of any court of record within the United States or elsewhere, to appear for TENANT and with or without declaration filed, confess judgment against the TENANT, and in favor of said LESSOR, its heirs, devisees, executors, administrators or assigns, as of any term, for the sums due by reason of said default in the payment of Rent, or Additional Rent or of Damages or any other sum due by TENANT including unpaid Rent for the balance of the term or thereafter if the same shall have become due and payable under the provisions herein, and/or for the sum due by reason of any breach of covenant or agreement by TENANT herein, with costs of suit and attorney's commission of Ten Percent (10%) for collection, and forthwith issue writ or writs of execution thereon, with release of all errors, and without stay of execution, and inquisition and extension upon any levy on real estate is hereby expressly waived, and condemnation agreed to, and exemption of any and all property from levy and sale by virtue of any exemption law now in force or which may be hereafter passed is also expressly waived by TENANT.

In case of violation of any of the covenants or agreements in this LEASE by TENANT, the said TENANT further, at the option of said LESSOR, authorizes and empowers any such attorney, either in addition to or without such judgment for the amount due according to the terms of this LEASE, to appear for said TENANT and confess judgment forthwith against TENANT, and in favor of LESSOR, or in an amicable action of ejectment for the PREMISES above described, with all the conditions, fees, releases, waivers of stay of execution and waiver of exemption to accompany said confession of judgment in ejectment as are set forth herein for confession of judgment for said sum or
sums due; and authorizes the entry of such action, confession of judgment for said sum or sums due; and authorizes the entry of such action, confession of judgment thereon, and the immediate issuing of a Writ of Possession and Writ of Execution for the amount of such judgment and costs.

In case of violation of any of the covenants or agreements in this LEASE by TENANT, the TENANT expressly waives to the LESSOR the benefits of Act No. 20, approved April 6, 1951 entitled "The Landlord and Tenant Act of 1951," requiring notice to vacate the PREMISES.

LESSOR may exercise its right to confess judgment for money or possession in separate actions or in a single action and may confess judgment as often as necessary, both prior to and after expiration of this LEASE and during or after any renewal thereof, with the right to confess judgment to continue whether TENANT is a tenant, holdover tenant, trespasser, tenant at will or at sufferance, until LESSOR is fully compensated for all rent, all amounts reserved or treated as rent or otherwise due hereunder, whether as damages or as rent, to fully compensate LESSOR for any sums or rights due LESSOR, without fear of exhaustion.

The right to confess judgment hereunder shall continue so long as TENANT is in possession of the PREMISES and thereafter so long as TENANT is liable to LESSOR for any sums due under the terms of this LEASE. And, further, LESSOR may confess judgment for both rent and possession and, unless and until LESSOR is made whole by reletting the premises, may collect any loss from TENANT by reason of the confessed judgment.

12. **LESSOR NOT LIABLE FOR INJURY OR DAMAGE TO PERSONS OR PROPERTY:** The LESSOR shall not be liable for any injury or damage to any person or to any property at any time on said PREMISES from any cause whatever that may at any time exist from the use or condition of the PREMISES from any cause, during the Term or any renewal thereof.
TENANT shall save LESSOR harmless from any loss, claim or injury to person or property and
TENANT shall be responsible to protect and defend LESSOR in case of any claim or action even if
LESSOR may be at fault, unless due to intentional affirmative action taken by LESSOR. Under no
condition shall LESSOR be liable for an act of neglect such as failure to maintain the PREMISES.

13. **INCREASED TAXES:** In the event the taxes, including those imposed by any
Municipality, County, or School District, levied and assessed against the real estate of which the
PREMISES are a part of are increased beyond that imposed for the year 2015, whether occasioned by
an increase in millage or an increase in assessment or otherwise, the TENANT shall pay as
Additional Rent all of said increased taxes during the Term of this LEASE or any renewal thereof.

14. **EXCLUSIVITY OF LESSOR'S REMEDIES:** The receipt of rent after default, or after
judgment or after execution, shall not deprive the LESSOR of other actions against the TENANT for
possession or for rent or for damages, and all such remedies are non-exclusive and can be exercised
concurrently or separately as LESSOR desires. The LESSOR may use the remedies herein given or
those prescribed by law, or both, and the LESSOR or Agent may enter at will to inspect the premises,
to take or send persons on said property, seeking to rent or purchase, make repairs or improvements
and post notices of "For Rent" and "For Sale."

15. **SUCCESSIONS AND ASSIGNS:** All rights and liabilities herein given to or imposed
upon either of the parties hereto shall extend to the heirs, executors, administrators, successors and
assigns (except in an assignment in violation of this LEASE) of such party. The preceding terms shall
not grant TENANT the right of assignment, whether voluntary or by operation of law, which is
specifically prohibited.

16. **CONDEMNATION CLAUSE:** In the event that all or a part of the PREMISES is taken by
eminent domain or conveyed in lieu thereof, if the leased PREMISES cannot reasonably be used by TENANT for its intended purpose, then this LEASE will terminate effective as of the date that the condemning authority shall take possession of the same.

17. **TENANT'S WAIVER OF DAMAGES AND EXCEPTIONS:** TENANT hereby waives all claims against LESSOR by reason of a taking of the PREMISES and assigns to LESSOR any rights based upon the use value or excess value of the LEASE over the cost thereof; except that TENANT shall be entitled to make any claim against the condemning authority for relocation damages, damages for tenant improvements and any other payments lawfully due tenants as such, so long as such payments do not diminish the rights of LESSOR.

Further, TENANT waives any claim for incidental or consequential damages due to a breach by LESSOR. If LESSOR breaches this LEASE by failing to maintain or repair the PREMISES when obligatory, TENANT's sole remedy shall be to make the repairs and file an action for the cost thereof, but shall not be entitled to any other damages of any kind whatsoever.

18. **WAIVER OF NONPERFORMANCE:** Failure of the LESSOR to exercise any of its rights under this LEASE upon nonperformance by the TENANT of any condition, covenant or provision herein contained shall not be considered a waiver thereof, nor shall any waiver of nonperformance of any such condition, covenant or provision by the LESSOR be construed as a waiver of the rights of the LESSOR as to any subsequent defective performance or nonperformance hereunder.

19. **PAROL EVIDENCE CLAUSE:** This instrument constitutes the final, fully integrated expression of the agreement between the LESSOR and the TENANT. As such, it cannot be modified or amended in any way except in writing signed by the LESSOR or TENANT.
20. **SUBORDINATION:** This LEASE is subordinate to the lien of all present or future mortgages which affect the leased PREMISES and to all renewals, modifications, replacements and extensions thereof. This clause shall be self-operative but in any event TENANT hereby agrees to execute promptly and deliver an estoppel certificate or other assurances that LESSOR may request in furtherance hereof; provided, however, that in the event of foreclosure of any such mortgage or modification TENANT shall attorn to the purchaser in foreclosure or who shall be named in any deed in lieu of foreclosure and shall recognize such purchaser as the LESSOR under this LEASE; and provided, further, that so long as TENANT is not in default hereunder, this LEASE shall remain in full force and effect.

21. **SEVERABILITY CLAUSE:** If any term, covenant, condition, or provision of this LEASE is held by a court of competent jurisdiction to be invalid, void, or unenforceable, the remainder of the provisions shall remain in full force and effect and shall in no way be affected, impaired, or invalidated.

22. **PENNSYLVANIA LAW TO APPLY:** This LEASE shall be construed under and in accordance with the laws of the Commonwealth of Pennsylvania.

23. **HOLDING OVER.** If TENANT holds over after the expiration of this LEASE, LESSOR shall have the following options:

   (1) To accept TENANT as a holdover TENANT for another year, with the yearly rent to then increase by Ten Percent (10%) over the highest monthly rent due hereunder and each succeeding year to increase the rent by the same Ten Percent (10%) of the last highest rent.

   (2) To treat TENANT as a trespasser, in which case, in lieu of rent, TENANT shall pay LESSOR double the highest rent due hereunder as liquidated damages and such damages shall be treated as rent for purposes of confession of judgment, and TENANT expressly acknowledges that LESSOR's rights to confess judgment hereunder will apply to said liquidated damages as well as rent. LESSOR may proceed with ejectment of TENANT if the TENANT is treated as a trespasser despite
the payment and/or acceptance of rent.

(3) To treat TENANT as a tenant at will in which case the LEASE shall become a month to month LEASE with rent increased as set forth in part (1) hereof; however, LESSOR may increase the rent beyond the amount otherwise provided for by thirty (30) days written notice to TENANT. LESSOR’s election hereunder need not be made until TENANT gives LESSOR notice demanding that an election be made.

24. NOTICE:

All notices provided for herein shall be by writing by certified mail, return receipt requested or by a major package delivery service which receipts documents, such as Federal Express, as follows to the addresses as set forth herein.

25. TENANT IMPROVEMENTS: All improvements or work performed by TENANT shall be performed in accordance with all building, zoning and other ordinances that are applicable. All work shall be pursuant to no-lien agreements between TENANT and any contractor. All contractors shall be licensed by the City of Pittsburgh. All work shall be performed in a workmanlike manner utilizing good quality materials. TENANT desires to install a rest room on the first floor and remove the rest room from the balcony. LESSOR authorizes the same on condition that the new restroom is fully constructed and permitted, utilizing materials and appliances that are of equal or better quality than the existing restroom before removing the existing restroom. TENANT may also replace flooring, install counters and generally build out whatever is required for the sandwich shop, including but not limited to signage, counters, and fixtures, all subject to providing to LESSOR a general plan for approval. Any other remodeling shall be subject to LESSOR’s approval which shall not be unreasonably withheld. No structural renovations may be made without specific LESSOR approval, which may be subject to a requirement for engineering certification.

[THE REMAINDER OF THIS PAGE IS INTENTIONALLY LEFT BLANK. SIGNATURES TO APPEAR ON THE FOLLOWING PAGE]
IN WITNESS WHEREOF, the undersigned LESSOR and TENANT hereto execute this LEASE as of the day and date first above written.

WITNESS/ATTEST

____________________

LESSOR:
CV Realty Holding, LLC

________________________
Theodore Hayes Paul
Managing Partner

3/17/2017

WITNESS/ATTEST

____________________

TENANT:
Commonwealth Medical Alternatives, LLC

________________________
Charles A. Knoll
Member
Affidavit of Business History

State of Pennsylvania  County of Allegheny

The undersigned, Charles A. Knoll, hereby certifies the following:

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

<table>
<thead>
<tr>
<th>Name of individual</th>
<th>Role (principal, operator, financial backer or employee)</th>
<th>Business name and address</th>
<th>Position of management or ownership of a controlling interest</th>
<th>Dates</th>
</tr>
</thead>
<tbody>
<tr>
<td>Please see attached document.</td>
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<td></td>
</tr>
</tbody>
</table>

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

Charles Knoll
Signature of Affiant and Title
3/13/17
Date

Sworn to and subscribed before me this 13 day of March, 2017

Heather Broman
Notary Public

COMMONWEALTH OF PENNSYLVANIA
NOTARIAL SEAL
HEATHER L BROMAN
Notary Public
SEWICKLEY BORO, ALLEGHENY COUNTY
My Commission Expires Feb 14, 2021

A photocopy, facsimile or other electronic version of this document shall be accepted as an original signature.
Affidavit of Business History Cont’d

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

<table>
<thead>
<tr>
<th>Name of Individual</th>
<th>Role (principal, operator, financial backer or employee)</th>
<th>Business name and address</th>
<th>Position of Management or ownership of a controlling interest</th>
<th>Dates</th>
</tr>
</thead>
<tbody>
<tr>
<td>Brian Vicente (as the sole member of BV Pennsylvania Holdings, LLC)</td>
<td>Principal</td>
<td>Waveseer of Nevada, LLC 1248 West Altgeld Street Chicago, IL 60614</td>
<td>4/21/14 - Present</td>
<td></td>
</tr>
<tr>
<td>Brian Vicente (as the sole member of BV Pennsylvania Holdings, LLC)</td>
<td>Principal</td>
<td>Bloomfield Industries Inc. 201 Edward Curry Avenue Staten Island, NY 10304</td>
<td>6/3/15 – 2/2/17</td>
<td></td>
</tr>
<tr>
<td>Brian Vicente (as the sole member of BV Pennsylvania Holdings, LLC)</td>
<td>Principal</td>
<td>Green Parcel Services 914 Newton St. Denver, CO 80204</td>
<td>7/9/15 - Present</td>
<td></td>
</tr>
<tr>
<td>Brian Vicente (as the sole member of BV Pennsylvania Holdings, LLC)</td>
<td>Principal</td>
<td>For Success Holding Company 1340 E. 6th Street #622 Los Angeles, CA 90021</td>
<td>9/8/16 - Present</td>
<td></td>
</tr>
<tr>
<td>Brian Vicente (as the sole member of BV Pennsylvania Holdings, LLC)</td>
<td>Principal</td>
<td>Doctors Orders Maryland 10303 Montgomery Avenue Kensington, Maryland 20895</td>
<td>11/5/15 - Present</td>
<td></td>
</tr>
<tr>
<td>Brian Vicente (as the sole member of BV Pennsylvania Holdings, LLC)</td>
<td>Principal</td>
<td>Surterra Florida, LLC 2601 Capital Medical Boulevard Tallahassee, FL 32308</td>
<td>3/31/15 - Present</td>
<td></td>
</tr>
<tr>
<td>Name</td>
<td>Position</td>
<td>Company Details</td>
<td>Dates</td>
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<tr>
<td>Brian Vicente (as the sole member of BV Pennsylvania Holdings, LLC)</td>
<td>Principal</td>
<td>Bickel Consulting Inc. 10 Laughing Valley Ranch Road Idaho Springs CO, 80452</td>
<td>9/16/15 - Present</td>
<td></td>
</tr>
<tr>
<td>Brian Vicente (as the sole member of BV Pennsylvania Holdings, LLC)</td>
<td>Principal</td>
<td>St. James Global 201 Edward Curry Avenue Staten Island, NY 10304</td>
<td>4/26/16 - Present</td>
<td></td>
</tr>
<tr>
<td>Brian Vicente (as the sole member of BV Pennsylvania Holdings, LLC)</td>
<td>Principal</td>
<td>iAnthus Capital Holdings, Inc. 420 Lexington Avenue New York, NY 10170</td>
<td>11/18/16 - Present</td>
<td></td>
</tr>
<tr>
<td>Morgan Carr</td>
<td>Principal</td>
<td>MMST LLC 1724 S. Broadway Denver, CO 80210</td>
<td>9/15/09 – Present</td>
<td></td>
</tr>
<tr>
<td>Morgan Carr</td>
<td>Principal</td>
<td>WSCC, INC 1025 Ridgeview Dr. Suite 100, Reno, NV 89519</td>
<td>11/3/14 – 5/31/16</td>
<td></td>
</tr>
</tbody>
</table>
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 Allegheny  

The undersigned, Charles Knoll, 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): Morgan Carr
Offense(s): [Redacted]

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): Amy Dannemiller
Offense(s): [Redacted]

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]
[Name]
[Title]
[Date]

Sworn to and subscribed before me this 18th day of March, 2017

[Signature]
[Name]
[Title]

COMMONWEALTH OF PENNSYLVANIA

NOTARIAL SEAL

HEATHER L BROMAN
Notary Public
SEWICKLEY BORO, ALLEGHENY COUNTY
My Commission Expires Feb 14, 2021

A photocopy, facsimile or other electronic version of this document shall be accepted as an original signature.
ATTACHMENT I-1: AFFIDAVIT OF CAPITAL SUFFICIENCY FOR A GROWER/PROCESSOR PERMIT APPLICANT

COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF HEALTH

AFFIDAVIT OF CAPITAL SUFFICIENCY

State of Pennsylvania
County of Allegheny

I/WE Commonwealth Medical Alternatives, LLC

_100 Grant Street
ADDRESS

Munhall PA 15120 Allegheny CITY STATE ZIP CODE COUNTY

PHONE

For the following applicant:

Commonwealth Medical Alternatives, LLC

NAME OF BUSINESS

_100 Grant Street
ADDRESS

Munhall PA 15120 Allegheny CITY STATE ZIP CODE COUNTY

PHONE

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):
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]
[Co-CEO]

[Date]

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

[Notary Public]

COMMONWEALTH OF PENNSYLVANIA

NOTARIAL SEAL

HEATHER L BROGAN

Notary Public

SEWICKLEY BORO, ALLEGHENY COUNTY
My Commission Expires Feb 14, 2021

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

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

<table>
<thead>
<tr>
<th>Business Name, as it appears on the applicant’s certificate of incorporation, charter, bylaws, partnership agreement or other official documents:</th>
<th>Commonwealth Medical Alternatives, LLC</th>
</tr>
</thead>
<tbody>
<tr>
<td>Trade names and DBA (doing business as) names:</td>
<td>N/A</td>
</tr>
<tr>
<td>Principal Business Address:</td>
<td>100 Grant Street</td>
</tr>
<tr>
<td>City: Munhall</td>
<td>State: PA</td>
</tr>
<tr>
<td>Phone:</td>
<td>Fax:</td>
</tr>
</tbody>
</table>
Grower/Processor: Commonwealth Medical Alternatives, LLC
Address: 1676 Freeport Road, North Buffalo Township, Pennsylvania, 16201
Permit #: 293845790 // Species: Cannabis Sativa L.
1 Indica Pre-Filled Vaporizer Cartridge // 20 Individual Doses
Harvest Lot #: 38458204 // Unique Identifier: 203945 // Process Lot #: 456
Net Weight of Product: 1 gram Packaged on: 9/28/2017 // Expiration Date: 9/28/2018
Concentration of Cannabinoids: THC 5.4 % // CBD 0.8 % // THCA 60.7 % // THCV 0.0 % // CBDA 8.8 % // CBDV 0.0 % // CBN 0.0 % // CBG 0.0 % // CBC 0.0 %
Employee ID # of packager: 23934847 // Employee ID # of shipper: 8335749
Dispensary Name:
Dispensary Address: 34 Elm St, Anytown, Pennsylvania, 38495
Tested by: ABC Testing Laboratory // Tested on: 9/20/2018
Instructions for storage: Keep in a cool, dry, locked storage container out of reach of children.

WARNING:
This product is for medicinal use only.
Women should not consume during pregnancy or while breastfeeding except on the advice of the practitioner who issued the certification and, in the case of breastfeeding, the infant's pediatrician.
This product might impair the ability to drive or operate heavy machinery.
Keep out of reach of children.
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.
Grower/Processor: Commonwealth Medical Alternatives, LLC
Address: 1676 Freeport Road, North Buffalo Township, Pennsylvania, 16201
Permit #: 293845790 // Species: Cannabis Sativa L.
1 Package of Indica Press Tablets // 20 Individual Doses
Harvest Lot #: 3845354 // Unique Identifier: 3539445 // Process Lot #: 343
Net Weight of Product: 10 gram Packaged on: 10/15/2017 // Expiration Date: 10/15/2018
Concentration of Cannabinoids: THC 20.7 %// CBD 10.8 %// THCA 1.7 %// THCV 0.0 %//
CBD A 3.8 %// CBDV 0.0 %// CBN 0.0 %// CBG 0.0 %// CBC 0.0 %
Employee ID # of packager: 23934847 // Employee ID # of shipper: 8335749
Dispensary Name:
Dispensary Address: 34 Elm St, Anytown, Pennsylvania, 38495
Tested by: ABC Testing Laboratory // Tested on: 9/20/2018
Instructions for storage: Keep in a cool, dry, locked storage container out of reach of children.

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

Keep out of reach of children.
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.
Grower/Processor: Commonwealth Medical Alternatives, LLC
Address: 1676 Freeport Road, North Buffalo Township, Pennsylvania, 16201
Permit #: 293845790 // Species: Cannabis Sativa L.
1 Package of Sativa Gel Capsules // 20 Individual Doses
Harvest Lot #: 38458204 // Unique Identifier: 203945 // Process Lot #: 456
Net Weight of Product: 10 grams
Packaged on: 9/28/2017 // Expiration Date: 9/28/2018
Concentration of Cannabinoids: THC 26.9 %// CBD 12.8%// THCA 10.7 %// THCV 0.0 %// CBDA 1.8%// CBDV 0.0 %// CBN 0.0 %// CBG 0.0 %// CBC 0.0 %
Employee ID # of packager: 23934847 // Employee ID # of shipper: 8335749
Dispensary Name:
Dispensary Address: 34 Elm St, Anytown, Pennsylvania, 38495
Tested by: ABC Testing Laboratory // Tested on: 9/20/2018
Instructions for storage: Keep in a cool, dry, locked storage container out of reach of children.

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

Keep out of reach of children.
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.
Grower/Processor: Commonwealth Medical Alternatives, LLC
Address: 1676 Freeport Road, North Buffalo Township, Pennsylvania, 16201
Permit #: 293845790 // Species: Cannabis Sativa L.
1 Pain Relief Cream // 40 Individual Doses
Harvest Lot #: 38458204 // Unique Identifier: 203945 // Process Lot #: 456
Net Weight of Product: 10 fl oz
Packaged on: 9/28/2017 // Expiration Date: 9/28/2018
Concentration of Cannabinoids: THC 10.7 %// CBD 8.8 %// THCA 10.7 %// THCV 0.0 %// CBDA 8.8 %// CBDV 0.0 %// CBN 0.0 %// CBG 0.0 %// CBC 0.0 %
Employee ID # of packager: 23934847 // Employee ID # of shipper: 8335749
Dispensary Name:
Dispensary Address: 34 Elm St, Anytown, Pennsylvania, 38495
Tested by: ABC Testing Laboratory // Tested on: 9/20/2018
Instructions for storage: Keep in a cool, dry, locked storage container out of reach of children.

WARNING:

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

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.
Grower/Processor: Commonwealth Medical Alternatives, LLC
Address: 1676 Freeport Road, North Buffalo Township, Pennsylvania, 16201
Permit #: 293845790 // Species: *Cannabis Sativa L.*
1 Blue Dream Concentrate // 20 Individual Doses
Harvest Lot #: 38458204 // Unique Identifier: 203945 // Process Lot #: 456
Net Weight of Product: 1 gram
Packaged on: 9/28/2017 // Expiration Date: 9/28/2018
Concentration of Cannabinoids: THC 8.7 %// CBD 2.6 %// THCA 62.7 %// THCV 0.0 %// CBDA 9.8 %// CBDV 0.0 %// CBN 0.0 %// CBG 0.0 %// CBC 0.0 %
Employee ID # of packager: 23934847 // Employee ID # of shipper: 8335749
Dispensary Name:
Dispensary Address: 34 Elm St, Anytown, Pennsylvania, 38495
Tested by: ABC Testing Laboratory // Tested on: 9/20/2018
Instructions for storage: Keep in a cool, dry, locked storage container out of reach of children.

**WARNING:**

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

Keep out of reach of children.

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.
Grower/Processor: Commonwealth Medical Alternatives, LLC
Address: 1676 Freeport Road, North Buffalo Township, Pennsylvania, 16201
Permit #: 293845790 // Species: Cannabis Sativa L.
1 Indica Tincture // 20 Individual Doses
Harvest Lot #: 38458204 // Unique Identifier: 203945 // Process Lot #: 456
Net Weight of Product: 5 fl oz
Packaged on: 9/28/2017 // Expiration Date: 9/28/2018
Concentration of Cannabinoids: THC 20.7 %/ CBD 18.8 %/ THCA 10.1 %/ THCV 0.0 %/ CBDA 8.8 %/ CBDV 0.0 %/ CBN 0.0 %/ CBG 0.0 %/ CBC 0.0 %
Employee ID # of packager: 23934847 // Employee ID # of shipper: 8335749
Dispensary Name:
Dispensary Address: 34 Elm St, Anytown, Pennsylvania, 38495
Tested by: ABC Testing Laboratory // Tested on: 9/20/2018
Instructions for storage: Keep in a cool, dry, locked storage container out of reach of children.

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

Keep out of reach of children.
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.
Grower/Processor: Commonwealth Medical Alternatives, LLC
Address: 1676 Freeport Road, North Buffalo Township, Pennsylvania, 16201
Permit #: 293845790 // Species: Cannabis Sativa L.
1 Sativa CO2 Oil // 20 Individual Doses
Harvest Lot #: 38458204 // Unique Identifier: 203945 // Process Lot #: 456
Net Weight of Product: 1 gram Packaged on: 9/28/2017 // Expiration Date: 9/28/2018
Concentration of Cannabinoids: THC 3.7 %// CBD 2.8 %// THCA 59.7 %// THCV 0.0 %//
CBDA 12.8 %// CBDV 0.0 %// CBN 0.0 %// CBG 0.0 %// CBC 0.0 %
Employee ID # of packager: 23934847 // Employee ID # of shipper: 8335749
Dispensary Name:
Dispensary Address: 34 Elm St, Anytown, Pennsylvania, 38495
Tested by: ABC Testing Laboratory // Tested on: 9/20/2018
Instructions for storage: Keep in a cool, dry, locked storage container out of reach of children.

WARNING:
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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.
CREAM CONCENTRATE WITH WARNING LABEL ON THE SIDE
Die line of actual size cream concentrate box with warnings on the side.
RELEASE AUTHORIZATION

TO: ____________________________________________

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

FROM: ___Commonwealth Medical Alternatives, LLC__________________________

Applicant's Name

I, ___Charles A. Knoll__________________________, 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

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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 13 day of March, 2017.

Authorized Signatory

STATE OF Pennsylvania )
COUNTY OF Allegheny ) ss:

On this 13 day of March, 2017, before me, a Notary Public, personally appeared 
Heather L. Broman (known to me or satisfactorily proven) to be the person whose 
name is subscribed in this Release, and acknowledged that he/she executed the same for the purposes 
herein contained.

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

Notary Public

MY COMMISSION EXPIRES:

COMMONWEALTH OF PENNSYLVANIA
NOTARIAL SEAL
HEATHER L. BROMAN
Notary Public
SEWICKLEY Boro, ALLEGHENY COUNTY
My Commission Expires Feb 14, 2021
Attachment M:
Grow Details
Commonwealth Medical Alternatives

Flower Rooms 1-8 34' x 23'
Project code: GAN1000EL
Date: 16-01-2017
Designer: Amber Piech
Description: 4 Rows of 9 GAN1000EL Fixtures are hung @ 12' above Finished Floor (Bottom of the fixture sits @ 11'3" above Finished Floor)
Average Intensity is: 950umols
Total Fixtures: 36

The nominal values shown in this report are the result of precision calculations, based upon precisely positioned luminaires in a fixed relationship to each other and to the area under examination. In practice the values may vary due to tolerances on luminaires, luminaire positioning, reflection properties and electrical supply.

Gavita Canada Inc
360 York Road, Ste 3-6
Niagara-On-The-Lake, Ontario, Canada
L0S1J0

Telephone: 905-988-3590
Fax: 905-988-3671
Mobile Phone: 289-407-5274
E-Mail: amber@gavita.ca

CalcLuX Indoor 5.0b
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1. **Project Description**  
   1.1 3-D Project Overview  
   1.2 Top Project Overview  
   1.3 Left Project Overview  

2. **Summary**  
   2.1 Room Summary  
   2.2 Project Luminaires  
   2.3 Calculation Results  

3. **Calculation Results**  
   3.1 Calc @ Bench Height 18": Filled Iso Contour  
   3.2 Calc @ 2’ ABT: Filled Iso Contour  
   3.3 Calc @ 3’ ABT: Filled Iso Contour  
   3.4 Calc @ 4’ ABT: Filled Iso Contour  
   3.5 Calc @ 5’ ABT: FilledIso Contour  
   3.6 Calc @ 6’ ABT: Filled Iso Contour  

4. **Luminaire Details**  
   4.1 Project Luminaires
Commonwealth Medical Alternatives

Flower Room 9 48' x 23'

Project code: GAN1000EL
Date: 16-01-2017

Designer: Amber Piech

Description: 4 Rows of 13 GAN1000EL
Fixtures are hung @ 11'9'' above Finished Floor
(Bottom of the fixture sits @ 11' above Finished Floor)
Average Intensity is: 960umols
Total Fixtures: 52

The nominal values shown in this report are the result of precision calculations, based upon precisely positioned luminaires in a fixed relationship to each other and to the area under examination. In practice the values may vary due to tolerances on luminaires, luminaire positioning, reflection properties and electrical supply.
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3. Calculation Results 7
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   3.2 Calc @ 2’ ABT: Filled Iso Contour 8
   3.3 Calc @ 3’ ABT: Filled Iso Contour 9
   3.4 Calc @ 4’ ABT: Filled Iso Contour 10
   3.5 Calc @ 5’ ABT: Filled Iso Contour 11
   3.6 Calc @ 6’ ABT: Filled Iso Contour 12

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   4.1 Project Luminaires 13
### FLORA SERIES

**All amounts per 3.79 Liters (1 US Gallon)**

**Drain to Waste Nutrient Solution Tips:**
- Keep nutrient solution temperature below 75°F (24°C).
- Allow 5% - 25% runoff each irrigation.
- Consider fresh water irrigation after 1 - 3 nutrient applications.
- To flush, apply fresh water irrigation after three nutrient applications. flush excess mineral accumulation.
- Keep nutrient solution aerated.
- For best results maintain nutrient solution pH between 5.5 - 6.5.

**Troubleshooting factors to consider:**
- Acid, bright, hot environments cause plants to drink more than if they are grown where it's humid, dim, and cool. Thus gardeners should use less concentrated nutrient solutions when growing conditions are more intense in order to lessen the risk of overfeeding.
- The pH (acidity or alkalinity) of a nutrient solution affects the availability of the elements contained within. Use pH pH adjusters to maintain nutrient pH between 5.5 - 6.5.

**Which comes first, Armor Si or CALIMagic?**
- When using both Armor Si and CALIMagic, add Armor Si to the reservoir first.
- When using Armor Si and/or CALIMagic, with Flora Series, these products should be added prior to adding FloraMicro.

### CREATE YOUR OWN FEEDCHART

**Personalized Program**

<table>
<thead>
<tr>
<th>WEEK #</th>
<th>GROWTH (18h photoperiod)</th>
<th>BLOOM (12h photoperiod)</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>1 Seedling</td>
<td>2 Early Growth</td>
</tr>
<tr>
<td></td>
<td>1 ml</td>
<td>2 ml</td>
</tr>
</tbody>
</table>

**Useful Conversions**

- 1 TSP = 5 ml
- 1 TBP = 15 ml
- 1 oz = 30 ml
- 1 qt = 946 ml
- 1 gal = 3.785 L
- 1 gal = 128 oz
Pictures from COO, Morgan Carr's, cultivation facilities.
**Client:** MMST LLC  
**Sample Receive Date:** 10/19/15  
**Item Type:** Plant  
**Item Notes:**

**Item:** Cannatonic  
**Testing Date:** 10/21/15  
**Report Date:** 10/22/15

### Cannabinoid Levels

<table>
<thead>
<tr>
<th>Cannabinoid</th>
<th>%</th>
<th>mg/gram</th>
</tr>
</thead>
<tbody>
<tr>
<td>THC</td>
<td>N/D</td>
<td>N/D</td>
</tr>
<tr>
<td>THC-A</td>
<td>0.8%</td>
<td>8</td>
</tr>
<tr>
<td>CBD</td>
<td>N/D</td>
<td>N/D</td>
</tr>
<tr>
<td>CBD-A</td>
<td>11.1%</td>
<td>111</td>
</tr>
<tr>
<td>CBN</td>
<td>N/D</td>
<td>N/D</td>
</tr>
<tr>
<td>CBG</td>
<td>N/D</td>
<td>N/D</td>
</tr>
<tr>
<td>CBG-A</td>
<td>N/D</td>
<td>N/D</td>
</tr>
<tr>
<td>CBG-C</td>
<td>N/D</td>
<td>N/D</td>
</tr>
<tr>
<td>THCV</td>
<td>12.0%</td>
<td>120</td>
</tr>
</tbody>
</table>

### Other Information

- **Moisture Content:** 0.1%  
- **THC Conversion:** 0.0%

---

For THC-A and CBD-A, these are the quantified active forms of the THC and CBD molecules, which can be converted to THC and CBD over time in storage. THC-A and CBD-A counts are adjusted to account for the percentage of THC and CBD decarboxylation over time. THC and CBD levels may decrease over time.

For THC and CBD, the numbers should ideally be over 5%. For all decarboxylated material, the figures generally range from 8% to 20%.

This text is a brief excerpt from a larger report. For detailed analysis, refer to the full report.
Potency Test Report
Sample DN073

MMST LLC
License No.: 403R-00039

Sample Received: 7/25/2016
Report Date: 7/27/2016
METRC No. 1A400031268EE070000001390

Grape Stomper
Item Type: Plant
Item Notes:

Total THC: 8.9%
THC + THC-A, % by weight

Total CBD: 11.9%
CBD + CBD-A, % by weight

<table>
<thead>
<tr>
<th>Cannabinoid Levels</th>
<th>%</th>
<th>mg/gram</th>
</tr>
</thead>
<tbody>
<tr>
<td>THC</td>
<td>0.62%</td>
<td>6.24</td>
</tr>
<tr>
<td>THC-A (1)</td>
<td>8.29%</td>
<td>82.89</td>
</tr>
<tr>
<td>CBD</td>
<td>N/D</td>
<td>N/D</td>
</tr>
<tr>
<td>CBD-A (1)</td>
<td>11.89%</td>
<td>118.86</td>
</tr>
<tr>
<td>CBN</td>
<td>N/D</td>
<td>N/D</td>
</tr>
<tr>
<td>CBG</td>
<td>N/D</td>
<td>N/D</td>
</tr>
<tr>
<td>CBG-A</td>
<td>0.62%</td>
<td>6.15</td>
</tr>
<tr>
<td>CBC</td>
<td>N/D</td>
<td>N/D</td>
</tr>
<tr>
<td>THCV</td>
<td>N/D</td>
<td>N/D</td>
</tr>
</tbody>
</table>

Other Information

| Moisture Content | 8.6% |
| THC Conversion (2) | 7.0% |

1: THC-A and CBD-A are the "inactive", acidic forms of the THC and CBD molecules, which convert to THC and CBD given time and/or heat. THC-A and CBD-A counts are adjusted to account for the greater weight of the acidic molecules.
2: This shows the amount of initial THC-A converted to THC by the time of testing. At harvest, this number is near zero. For well-cured plant material, this figure generally ranges from 5% to 20% for edibles and lactures, this number should be over 85%.

N/D = Not Detected, below our limit of accurate detection or quantification for the test.

RM3 LABS COLORADO LLC
BOULDER, CO
720.943.166
Potency Test Report
Sample DM601

MMST LLC
License No.: 403R-00039
Sample Received: 7/18/2016
Sour Kush
Report Date: 7/20/2016
Item Type: Plant
METRC No. 1A400031266EE07000001359
Item Notes:

Total THC: 24.4%
THC + THC-A, % by weight

Total CBD: N/D
CBD + CBD-A, % by weight

Cannabinoid Levels

<table>
<thead>
<tr>
<th>Cannabinoid</th>
<th>%</th>
<th>mg/gram</th>
</tr>
</thead>
<tbody>
<tr>
<td>THC</td>
<td>1.08%</td>
<td>10.80</td>
</tr>
<tr>
<td>THC-A</td>
<td>23.28%</td>
<td>232.84</td>
</tr>
<tr>
<td>CBD</td>
<td>N/D</td>
<td>N/D</td>
</tr>
<tr>
<td>CBD-A</td>
<td>N/D</td>
<td>N/D</td>
</tr>
<tr>
<td>CBN</td>
<td>N/D</td>
<td>N/D</td>
</tr>
<tr>
<td>CBG</td>
<td>N/D</td>
<td>N/D</td>
</tr>
<tr>
<td>CBG-A</td>
<td>1.98%</td>
<td>19.79</td>
</tr>
<tr>
<td>CBC</td>
<td>N/D</td>
<td>N/D</td>
</tr>
<tr>
<td>THCV</td>
<td>N/D</td>
<td>N/D</td>
</tr>
</tbody>
</table>

26.34% 263.43

Cannabis-A and CBD-A are the "active", acidic forms of the THC and CBD molecules, which convert to THC and CBD given time and/or heat. THC-A and CBD-A counts are adjusted to account for the greater weight of the acidic molecules.

Other Information

| Moisture Content | 6.4% |
| THC Conversion   | 4.4% |

This shows the amount of initial THC-A converted to THC by the time of testing. At harvest, this number is near zero. For well-cared plant material, this figure generally ranges from 5% to 20%. For edibles and the likes, this number should be over 85%.

N/D = Not Detected below our limit of accurate detection or quantification for the test.

Sample DM601

tm3 LABS COLORADO LLC
BOULDER, CO
720.943.166
Bioccontaminant Test Report

Report Date: 9/16/2016
Sample: DP927

Client: MMST LLC

Sample Information

<table>
<thead>
<tr>
<th>Sample Name</th>
<th>Sour Kush</th>
</tr>
</thead>
<tbody>
<tr>
<td>METRC #</td>
<td>1A400031266EE07000001517</td>
</tr>
<tr>
<td>Sample Type</td>
<td>Plant</td>
</tr>
<tr>
<td>Sample Received</td>
<td>9/13/2016</td>
</tr>
<tr>
<td>Sample Tested</td>
<td>9/16/2016</td>
</tr>
</tbody>
</table>

Organism | Test Result | Pass/Fail |
----------|-------------|-----------|
Salmonella spp. | - | PASS |
STEC (E. coli)   | - | PASS |
Total Yeast and Mold | <2,000 CFU/g | PASS |

Other Notes:

Rm3 Labs Colorado LLC
Boulder, CO
720.943.1665
Biocontaminant Testing

The Colorado Department of Revenue – Marijuana Enforcement Division (MED) currently plans to require biocontaminant analysis of cannabis, cannabis extracts and water-based concentrates. This biocontaminant testing aims to ensure consumer safety in cannabis products from harmful health effects associated with these biocontaminants. The preliminary biocontaminant limits planning to be enforced by the MED are as follows and are expressed in terms of Colony Forming Units (CFUs):

<table>
<thead>
<tr>
<th>Organism</th>
<th>Regulatory Limit</th>
</tr>
</thead>
<tbody>
<tr>
<td><em>Escherichia coli</em> (STEC)</td>
<td>&lt;1 CFU/g of product</td>
</tr>
<tr>
<td><em>Salmonella</em> species</td>
<td>&lt;1 CFU/g</td>
</tr>
<tr>
<td>Total Yeast and Mold</td>
<td>10,000 CFU/g</td>
</tr>
</tbody>
</table>

Rm3 Labs Biocontaminant Testing Methods

At Rm3 Labs we use a combination of microbiological plating and Quantitative Real-Time Polymerase Chain Reaction (qPCR) to detect potential pathogens in cannabis samples. This qPCR technology is a rapid DNA based detection method which allows us to quantify bacterial and fungal pathogens based on their unique DNA sequences and is extensively used in clinical diagnostics, food pathogen testing and pharmaceutical contaminant testing. Additionally, we have the ability to grow out and identify other contaminant organisms found in cannabis samples at our clients request.

The Limitations of our Test Methods

We do not test an entire “batch” of product; we only test the sample provided by the client. When testing cannabis samples, we ask for as representative a sample as possible; however, it is possible that the product received by an end consumer may be materially different from the sample we’ve tested.

Rm3 Labs tests for biocontaminant organisms specified in the MED contaminant testing regulations only and therefore other contaminants may be present other than those listed in this report.

There are currently no established protocols for medical marijuana testing in the U.S. As a result, each lab uses its own procedures, and results from different labs may not be directly comparable.

Results of our tests, and this report, may be used or displayed only by the client and only in connection with the batch of product from which the test sample was taken. By submitting a sample for analysis, the client has represented that product from which the sample has been taken is being held by the client in full compliance with Colorado state and local medical marijuana laws, and such product or any product made therefrom will only be offered for sale in compliance with such laws.
## Section 4 – Principals, Financial Backers, Operators and Employees

### A. Please list Principals, Financial Backers and Operators (Contd.)

<table>
<thead>
<tr>
<th>Name and Residential Address</th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>First Name:</strong> Thomas</td>
<td><strong>Middle Name:</strong> Carl</td>
</tr>
<tr>
<td><strong>Occupation:</strong> Physician</td>
<td><strong>Title in the Applicant’s Business:</strong> Medical Director</td>
</tr>
<tr>
<td><strong>DOH REDACTED</strong></td>
<td><strong>Date of Birth:</strong> DOH REDACTED</td>
</tr>
<tr>
<td><strong>Address Line 1:</strong> DOH REDACTED</td>
<td><strong>Address Line 2:</strong> N/A</td>
</tr>
<tr>
<td><strong>Address Line 3:</strong> N/A</td>
<td><strong>City:</strong> DOH REDACTED</td>
</tr>
<tr>
<td><strong>Phone:</strong> DOH REDACTED</td>
<td><strong>Fax:</strong> N/A</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Name and Residential Address</th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>First Name:</strong> Heather</td>
<td><strong>Middle Name:</strong> Leigh</td>
</tr>
<tr>
<td><strong>Occupation:</strong> Management Consultant</td>
<td><strong>Title in the Applicant’s Business:</strong> Director of IT</td>
</tr>
<tr>
<td><strong>DOH REDACTED</strong></td>
<td><strong>Date of Birth:</strong> DOH REDACTED</td>
</tr>
<tr>
<td><strong>Address Line 1:</strong> DOH REDACTED</td>
<td><strong>Address Line 2:</strong></td>
</tr>
<tr>
<td><strong>Address Line 3:</strong></td>
<td><strong>City:</strong> Verona</td>
</tr>
<tr>
<td><strong>Phone:</strong> DOH REDACTED</td>
<td><strong>Fax:</strong> DOH REDACTED</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Name and Residential Address</th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>First Name:</strong> Brian</td>
<td><strong>Middle Name:</strong> Peter</td>
</tr>
<tr>
<td><strong>Occupation:</strong> Attorney</td>
<td><strong>Title in the Applicant’s Business:</strong> Director of Regulatory &amp; Compliance Affairs</td>
</tr>
<tr>
<td><strong>DOH REDACTED</strong></td>
<td><strong>Date of Birth:</strong> DOH REDACTED</td>
</tr>
<tr>
<td><strong>Address Line 1:</strong> DOH REDACTED</td>
<td><strong>Address Line 2:</strong> N/A</td>
</tr>
<tr>
<td><strong>Address Line 3:</strong></td>
<td><strong>City:</strong> DOH REDACTED</td>
</tr>
<tr>
<td><strong>Phone:</strong> DOH REDACTED</td>
<td><strong>Fax:</strong> DOH REDACTED</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Name and Residential Address</th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>First Name:</strong> Patricia</td>
<td><strong>Middle Name:</strong> Eugenia</td>
</tr>
<tr>
<td><strong>Occupation:</strong> International Controller</td>
<td><strong>Title in the Applicant’s Business:</strong> Human Resources Manager</td>
</tr>
<tr>
<td><strong>Also known as:</strong> Patricia Ahumada</td>
<td><strong>Date of Birth:</strong> DOH REDACTED</td>
</tr>
<tr>
<td><strong>Address Line 1:</strong> DOH REDACTED</td>
<td><strong>Address Line 2:</strong></td>
</tr>
<tr>
<td><strong>Address Line 3:</strong></td>
<td><strong>City:</strong> DOH REDACTED</td>
</tr>
<tr>
<td><strong>Phone:</strong> DOH REDACTED</td>
<td><strong>Fax:</strong> DOH REDACTED</td>
</tr>
</tbody>
</table>
Section 9 - Employee Qualifications, Descriptions of Duties and Training Contd.

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

9. Heather Broman, Director of IT: Responsible for the development of strategic communications plans and building and sustaining CMA’s reputation for quality, reliability, and customer satisfaction. Implements and oversees the information and communications technology strategies of the CMA. Ensures CMA’s IT infrastructure is secure, reliable, strategically sound, and cost efficient reflecting its needs. Responsible for programming voice and data telecommunications network circuits and equipment as well as the interaction between computer systems, communication methods, and devices. Responsible for creating, maintaining, and continuously improving the CMA’s website and social media platforms. Optimizes CMA’s website exposure by analyzing search engine patterns to direct online placement of keywords or other content. Recommends and implements continuous improvement, responsiveness and search engine optimization (SEO). Responsible for managing the CMA’s brand and reputation and ensuring the public views the organization favorably. Oversees the implementation of communications events and activities that interact with customers, the public, the media, and employees of CMA.

10. Brian Vicente - Director of Regulatory & Compliance Affairs: Responsible for working with state, local, and federal governments to help meet legislative goals by creating policy proposals and working with government agencies and citizens. Oversees and helps coordinate the work of any contract lobbyists hired to lobby on the local, state, or federal level.

11. Patricia Ahumada - Human Resources Manager: Responsible for supervising and providing consultation to management on strategic staffing plans, compensation, benefits, training and development, budget, and labor relations. Has a leadership role in developing a culture that enables employees to perform in accordance with the CMA’s objectives. Responsible for the day-to-day financial operations such as general bookkeeping, bank statement reconciliation, payroll tasks, and accounts receivable and accounts payable. Also serves as community relations liaison.

12. TBD - Chief Cultivation Officer: Responsible for supervising all phases of CMA’s cultivation operations including: regulatory compliance, all phases of growing, harvesting and processing of medical marijuana, quality assurance, inventory control, purchasing, and shipping and receiving.

13. TBD - Cultivation Manager: Responsible for supervising all phases of CMA’s cultivation operations in coordination with the Chief Cultivation Officer including: regulatory compliance, all phases of growing, harvesting and processing of medical marijuana, quality assurance, inventory control, purchasing, and shipping and receiving. Responsible for supervising the propagation through processing phases of CMA’s cultivation operations and maintaining all crop records, as well as harvest and processing records. Ensures proper plant production schedules.

14. TBD - Harvest Manager: Responsible for scheduling harvests in coordination with the Chief Cultivation Officer. Other duties include assigning lot/batch numbers to each batch.
<table>
<thead>
<tr>
<th>Position</th>
<th>Responsibilities</th>
</tr>
</thead>
<tbody>
<tr>
<td>15. TBD - Packaging Manager</td>
<td>Responsible for overseeing the weighing, packaging, and labeling medical marijuana, as well as ensuring the accuracy of packaging and labeling. Oversees Packaging &amp; Shipping Technicians.</td>
</tr>
<tr>
<td>16. TBD - Section Grower</td>
<td>Responsible for the propagation of plants and caring for the plants until ready for harvest in assigned section. Overseen by the Cultivation Manager. Responsible for growth of plants, including ensuring plant health by pruning, topping, trimming, and analyzing plant health. Must strictly adhere to all hygiene and sanitation policies. Assist with facility cleanliness and quality control.</td>
</tr>
<tr>
<td>17. TBD - Assistant Grower</td>
<td>Responsible for the propagation of plants and caring for the plants until ready for harvest in coordination with Section Grower. Overseen by the Cultivation Manager. Responsible for growth of plants, including ensuring plant health by pruning, topping, trimming, and analyzing plant health. Must strictly adhere to all hygiene and sanitation policies. Assist with facility cleanliness and quality control.</td>
</tr>
<tr>
<td>18. TBD - Grow Technician</td>
<td>Responsible for the propagation of plants and caring for the plants until ready for harvest in coordination with Section Grower. Overseen by the Cultivation Manager. Responsible for growth of plants, including ensuring plant health by pruning, topping, trimming, and analyzing plant health. Must strictly adhere to all hygiene and sanitation policies. Assist with facility cleanliness and quality control.</td>
</tr>
<tr>
<td>19. TBD - Trimmer</td>
<td>Responsible for trimming operations in coordination with the Harvest Manager. Provides on-site support for the trimming of product as needed. Maintains accurate records of product trimmed to ensure product identification and quality control. Assists in harvesting, trimming, weighing, packaging and other activities as needed.</td>
</tr>
<tr>
<td>20. TBD - Extraction Technician</td>
<td>Responsible for the grinding and extraction of marijuana for marijuana products. Overseen by the Director of Processing.</td>
</tr>
<tr>
<td>21. TBD - Lab Technician</td>
<td>Responsible for testing and analysis for potency and safety, as well as working with the Director of Processing to identify genetic markers. Conducts internal marijuana testing during the curing phase, holding stage, and after packaging and labeling as directed by the Director of Processing.</td>
</tr>
<tr>
<td>22. Processing &amp; Manufacturing Technician</td>
<td>Responsible for formulating marijuana products and coordinating research and product development in coordination with the Director of Processing. Makes recommendations for the improvement and cost reduction of existing products and processes, as well as recommending new products and processes. Responsible for making and preparing all medical marijuana products.</td>
</tr>
<tr>
<td>23. TBD - Inventory Technician</td>
<td>Responsible for keeping and protecting all inventory and ensuring accuracy of the inventory. Oversees purchasing, shipping, and receiving. Ensures that incoming materials are receipted and managed appropriately and all outgoing medical marijuana is properly packaged and labeled. Responsible for creating and maintaining relationships with vendors to ensure constant procurement of supplies. Ensures the proper and timely ordering, storing, and distribution of all materials and supplies.</td>
</tr>
</tbody>
</table>
24. TBD - Director of Quality Assurance: Responsible for planning and directing quality assurance policies and the development and maintenance of the standard operating procedures. Directs process and product testing to ensure quality standards are met, as well as ensure compliance with all applicable state and local laws, regulations, ordinances, and other requirements. Reviews and evaluates compliance issues and concerns and ensures CMA is compliant with the rules set forth by the Department and all applicable state and local laws, regulations, ordinances, and other requirements, as well as CMA policies and procedures.

25. TBD - Packaging & Shipping Technician: Responsible for weighing, packaging, and labeling medical marijuana, as well as ensuring the accuracy of packaging and labeling. Responsible for creating and maintaining relationships with vendors to ensure constant procurement of supplies. Ensures the proper and timely ordering, storing, and distribution of all materials and supplies. Responsible for coordinating and keeping records of incoming and outgoing shipments, as well as preparing items for shipment. Responsible for developing and scheduling safe delivery routes by working closely with Director of Security and local law enforcement. Ensures the Delivery Team follow all security procedures regarding the transportation of medical marijuana.

26. TBD - Security Officer: Responsible for implementing and improving security procedures, as well as authorizing entrance and departure from the Facility. Overseen and works in coordination with the Director of Security.

B. Please describe the employee qualifications of each principal and employee.

9. Heather Broman, Director of IT: Since graduating from Robert Morris University with her Bachelor’s in Psychology & Social Sciences and a Master’s in Information Technology Security & Assurance, Ms. Broman has worked as a consultant for many Fortune 500 companies – including PPG, PNC, Dick’s Sporting Goods, Sheetz, and other major companies headquartered in Pennsylvania - to help “bridge the gap” between the needs of their business and how to best use technology to support those needs. Ms. Broman is a member of the Pittsburgh Technology Council, WELD (Women for Economic Leadership Development), PMI (Project Management Institute), and Girl Develop it. Ms. Broman has also held roles as the PR Coordinator and Strategic Development Chair of the LGBTQ PRIDE Group at J.P. Morgan Chase, led a team of programmers & designers to build a mobile application to find shelters and track services for the homeless in Columbus, Ohio, and is an active volunteer at the Gay & Lesbian Community Center (GLCC) in downtown Pittsburgh and is also currently volunteering her time with the Special Olympics of PA to improve their volunteer registration processes. Ms. Broman’s dedication to moving people and companies forward through new technology innovations makes her highly qualified to serve as CMA’s IT Director.

10. Brian Vicente, Director of Regulatory & Compliance Affairs: Brian Vicente, Esq., is a partner and founding member of Vicente Sederberg LLC. He served as the co-director of the Amendment 64 campaign and also serves as executive director of Sensible Colorado, the state's leading non-profit working for medical marijuana patients and providers. In 2010,
Vicente was elected the first-ever chair of the National marijuana Industry Association, the only trade association in the U.S. that works to advance the interests of marijuana-related businesses on the national level. Brian was the chair of the Committee for Responsible Regulation, which coordinated the successful 2013 campaign to implement statewide excise and sales taxes on the sale of adult-use marijuana in Colorado and was awarded the Justice Gerald Le Dain Award for Achievement in the Field of Law that same year. Vicente’s expertise in marijuana policy is highly sought after, and has led to him serving as a formal advisor to local, state, and federal governments—most recently he assisted with Uruguay becoming the first country in the world to fully-regulate the adult marijuana market. Brian serves on the board of directors for a number of state and national non-profit organizations including the SAFER Voter Education Fund and the Harm Reduction Action Center. Vicente graduated from the University of Denver Law School on a full merit scholarship where he clerked for outspoken social critic, Senior Federal Judge John L. Kane.

### 11. Patricia Ahumada, Human Resources Manager
Ms. Ahumada has extensive experience in business as a business consultant, international controller and accountant for P.E.I. Pittsburgh. She holds a Master’s Degree in Biology, an engineer in information systems and management control and a Certified Public Accountant from Universidad Mayor de Chile. She is a certified International Executive and Organizational Coach from the Center of Studies CEGO Corporation, an International Certification in Collaborative Conversations from Humberto Maturana Institute, and has taken courses in coaching and leadership. Ms. Ahumada is qualified to serve as CMA’s Human Resources Manager.

### 12. TBD, Chief Cultivation Officer
The Chief Cultivation Officer should hold a degree in horticulture or agriculture or have demonstrated experience in horticulture, agricultural production, or medical marijuana cultivation. Must have two years of experience in a position with managerial responsibilities and a thorough understanding of state medical marijuana laws and how they apply to the operations of CMA. Must qualify for a grower/processor employee under state law.

### 13. TBD, Cultivation Manager
The Cultivation Manager should hold a degree in horticulture or agriculture or have demonstrated experience in horticulture, agricultural production, or medical marijuana cultivation. Must have two years of experience in a position with managerial responsibilities and a thorough understanding of state medical marijuana laws and how they apply to the operations of CMA. Must qualify for a grower/processor employee under state law.

### 14. TBD, Harvest Manager
The Harvest Manager should hold a degree in horticulture or agriculture or have demonstrated experience in horticulture, agricultural production, or medical marijuana cultivation. Must have two years of experience in a position with managerial responsibilities and a thorough understanding of state medical marijuana laws and how they apply to the operations of CMA. Must qualify for a grower/processor employee under state law.

### 15. TBD, Packaging Manager
The Packaging Manager must have two years or more of experience in manufacturing, quality assurance, or packaging. Must have two years of experience in a position with managerial responsibilities and a thorough understanding of state medical marijuana laws and how they apply to the operations of CMA. Must qualify for a grower/processor employee under state law.

### 16. TBD, Section Grower
Must have two years of experience in a position with agriculture or
horticulture and a thorough understanding of state medical marijuana laws and how they apply to the operations of CMA. Must qualify for a grower/processor employee under state law.

<table>
<thead>
<tr>
<th>Position</th>
<th>Requirements</th>
</tr>
</thead>
<tbody>
<tr>
<td>17. TBD, Assistant Grower</td>
<td>Must have two years of experience in a position with agriculture or horticulture and a thorough understanding of state medical marijuana laws and how they apply to the operations of CMA. Must qualify for a grower/processor employee under state law.</td>
</tr>
<tr>
<td>18. TBD, Grow Technician</td>
<td>Must have two years of experience in a position with agriculture or horticulture and a thorough understanding of state medical marijuana laws and how they apply to the operations of CMA. Must qualify for a grower/processor employee under state law.</td>
</tr>
<tr>
<td>19. TBD, Trimmer</td>
<td>Entry level. Must have a thorough understanding of state medical marijuana laws and how they apply to the operations of CMA. Must qualify for a grower/processor employee under state law.</td>
</tr>
<tr>
<td>20. TBD, Extraction Technician</td>
<td>Must have two years of experience of more in manufacturing, processing, or a similar field and a thorough understanding of state medical marijuana laws and how they apply to the operations of CMA. Must qualify for a grower/processor employee under state law.</td>
</tr>
<tr>
<td>21. TBD, Lab Technician</td>
<td>Must have two years of experience of more in analytical laboratories or a similar field and a thorough understanding of state medical marijuana laws and how they apply to the operations of CMA. Must qualify for a grower/processor employee under state law.</td>
</tr>
<tr>
<td>22. TBD, Processing &amp; Manufacturing Technician</td>
<td>Must have two years of experience of more in manufacturing, processing, or a similar field and a thorough understanding of state medical marijuana laws and how they apply to the operations of CMA. Must qualify for a grower/processor employee under state law.</td>
</tr>
<tr>
<td>23. TBD, Inventory Technician</td>
<td>Must have two years of experience of more in inventory, quality control or a similar field and a thorough understanding of state medical marijuana laws and how they apply to the operations of CMA. Must qualify for a grower/processor employee under state law.</td>
</tr>
<tr>
<td>24. TBD, Director of Quality Assurance</td>
<td>The Director of Quality Assurance should hold a Bachelor of Science degree or have demonstrated experience in quality control and quality assurance. Must have two years of experience in a position with managerial responsibilities and a thorough understanding of state medical marijuana laws and how they apply to the operations of CMA. Must qualify for a grower/processor employee under state law.</td>
</tr>
<tr>
<td>25. TBD, Packaging &amp; Shipping Technician</td>
<td>Entry level. Must have two years of experience in a position with logistics, packaging, or a similar field, and a thorough understanding of state medical marijuana laws and how they apply to the operations of CMA. Must qualify for a grower/processor employee under state law.</td>
</tr>
<tr>
<td>26. TBD, Security Officer</td>
<td>Must have two years of experience or more in security, law enforcement, or military. Knowledge of internal security procedures including cameras,</td>
</tr>
</tbody>
</table>
C. Please describe the steps the applicant will take to assure that each principal and employee will meet the 2 hour training requirement under the Act and Regulations.

9. Heather Broman, Director of IT: CMA will ensure all employees have the education, training, and experience, or any combination thereof, to enable the employee to perform all assigned functions. The 2 hour training course developed by the Department must be completed prior to starting initial operation of a facility. The Director of IT must receive at least twelve (12) hours of ongoing training annually or more often as necessary to maintain compliant, safe, and productive operations, including the two-hour training course developed by the Department. The Director of IT must complete the two-hour training course developed by the Department within the times specified prior to commencing initial operation of the facility.

Training will include, at a minimum, the following:

- The provisions of the act and this part relevant to the responsibilities of principals and employees of growerprocessors.
- Proper handling of medical marijuana.
- Proper recordkeeping.
- How to prevent and detect the diversion of medical marijuana.
- Best practice security procedures.
- Best practice safety procedures, including responding to the following:
  - A medical emergency.
  - A fire.
  - A chemical spill.
  - A threatening event including:
    - An armed robbery.
    - A burglary.
    - A criminal incident.
- CMA’s Employee Handbook.
- Commonwealth of Pennsylvania’s Workers’ Compensation system and benefits.
- HIPAA, ADA, EEOC, and other federal, state, and local laws, regulations, ordinances, and other requirements related to general business and the medical marijuana industry.
- The quality assurance duties of each employee related to CMA operations.
- Inventory management system and other IT and communications software and hardware information.
- Instructions regarding regulatory inspection preparedness and law enforcement interactions.
- Workplace safety training.
- Hazard communication training.

CMA will maintain records of any training received and attendance records by the Director of IT. Each record of required training will include, at a minimum:
- Director of IT’s name and identification badge number.
- Signed statement from the Director of IT indicating the date, time, and place of training.
- Topics covered in training.
- Name and title of presenter(s).
- Certificate of attendance indicating satisfactory completion of training signed by presenter(s).

The Human Resources Manager will maintain all CMA training records and logs in each employee’s personnel file. All training documentation and personnel files will be made available for inspection by the Department and its authorized agents, upon request.

10. Brian Vicente, Director of Regulatory & Compliance Affairs: CMA will ensure all employees have the education, training, and experience, or any combination thereof, to enable the employee to perform all assigned functions. The 2 hour training course developed by the Department must be completed prior to starting initial operation of a facility. The Director of Regulatory & Compliance Affairs must receive at least twelve (12) hours of ongoing training annually or more often as necessary to maintain compliant, safe, and productive operations, including the two-hour training course developed by the Department. The Director of Regulatory & Compliance Affairs must complete the two-hour training course developed by the Department within the times specified prior to commencing initial operation of the facility.
Training will include, at a minimum, the following:

- The provisions of the act and this part relevant to the responsibilities of principals and employees of grower/processors.
- Proper handling of medical marijuana.
- Proper recordkeeping.
- How to prevent and detect the diversion of medical marijuana.
- Best practice security procedures.
- Best practice safety procedures, including responding to the following:
  - A medical emergency.
  - A fire.
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  - A threatening event including:
    - An armed robbery.
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- CMA’s Employee Handbook.
- Commonwealth of Pennsylvania’s Workers’ Compensation system and benefits.
- HIPAA, ADA, EEOC, and other federal, state, and local laws, regulations, ordinances, and other requirements related to general business and the medical marijuana industry.
- The quality assurance duties of each employee related to CMA operations.
- Inventory management system and other IT and communications software and hardware information.
- Instructions regarding regulatory inspection preparedness and law enforcement interactions.
- Workplace safety training.
- Hazard communication training.

CMA will maintain records of any training received and attendance records by the Director of Regulatory & Compliance Affairs. Each record of required training will include, at a minimum:

- Director of Regulatory & Compliance Affairs’ name and identification badge number.
- Signed statement from the Director of Regulatory & Compliance Affairs indicating the date, time, and place of training.
- Topics covered in training.
- Name and title of presenter(s).
- Certificate of attendance indicating satisfactory completion of training signed by presenter(s).

The Human Resources Manager will maintain all CMA training records and logs in each employee’s personnel file. All training documentation and personnel files will be made available for inspection by the Department and its authorized agents, upon request.

11. Patricia Ahumada, Human Resources Manager: CMA will ensure all employees have the education, training, and experience, or any combination thereof, to enable the employee to perform all assigned functions. The 2 hour training course developed by the Department must be completed prior to starting initial operation of a facility. The Human Resources Manager must receive at least twelve (12) hours of ongoing training annually or more often as necessary to maintain compliant, safe, and productive operations, including the two-hour training course developed by the Department. The Human Resources Manager must complete the two-hour training course developed by the Department within the times specified prior to commencing initial operation of the facility.

Training will include, at a minimum, the following:
- The provisions of the act and this part relevant to the responsibilities of principals and employees of grower/processors.
- Proper handling of medical marijuana.
- Proper recordkeeping.
- How to prevent and detect the diversion of medical marijuana.
- Best practice security procedures.
- Best practice safety procedures, including responding to the following:
  - A medical emergency.
  - A fire.
  - A chemical spill.
  - A threatening event including:
    - An armed robbery.
    - A burglary.
    - A criminal incident.
- CMA’s Employee Handbook.
● Commonwealth of Pennsylvania’s Workers’ Compensation system and benefits.
● HIPAA, ADA, EEOC, and other federal, state, and local laws, regulations, ordinances, and other requirements related to general business and the medical marijuana industry.
● The quality assurance duties of each employee related to CMA operations.
● Inventory management system and other IT and communications software and hardware information.
● Instructions regarding regulatory inspection preparedness and law enforcement interactions.
● Workplace safety training.
● Hazard communication training.

CMA will maintain records of any training received and attendance records by the Human Resources Manager. Each record of required training will include, at a minimum:

- Human Resources Manager’s name and identification badge number.
- Signed statement from the Human Resources Manager indicating the date, time, and place of training.
- Topics covered in training.
- Name and title of presenter(s).
- Certificate of attendance indicating satisfactory completion of training signed by presenter(s).

The Human Resources Manager will maintain all CMA training records and logs in each employee’s personnel file. All training documentation and personnel files will be made available for inspection by the Department and its authorized agents, upon request.

12. TBD, Chief Cultivation Officer: CMA will ensure all employees have the education, training, and experience, or any combination thereof, to enable the employee to perform all assigned functions. The 2 hour training course developed by the Department must be completed prior to starting initial operation of a facility. The Chief Cultivation Officer must receive at least twelve (12) hours of ongoing training annually or more often as necessary to maintain compliant, safe, and productive operations, including the two-hour training course developed by the Department. The Chief Cultivation Officer must complete the two-hour training
course developed by the Department within the times specified prior to commencing initial operation of the facility.

Training will include, at a minimum, the following:

- The provisions of the act and this part relevant to the responsibilities of principals and employees of grower/processors.
- Proper handling of medical marijuana.
- Proper recordkeeping.
- How to prevent and detect the diversion of medical marijuana.
- Best practice security procedures.
- Best practice safety procedures, including responding to the following:
  - A medical emergency.
  - A fire.
  - A chemical spill.
  - A threatening event including:
    - An armed robbery.
    - A burglary.
    - A criminal incident.
- CMA’s Employee Handbook.
- Commonwealth of Pennsylvania’s Workers’ Compensation system and benefits.
- HIPAA, ADA, EEOC, and other federal, state, and local laws, regulations, ordinances, and other requirements related to general business and the medical marijuana industry.
- The quality assurance duties of each employee related to CMA operations.
- Inventory management system and other IT and communications software and hardware information.
- Instructions regarding regulatory inspection preparedness and law enforcement interactions.
- Workplace safety training.
- Hazard communication training.

In addition to the above training, the Chief Cultivation Officer must also be required to complete the following training components:

- Cultivation Training, including:
  - USDA Good Agricultural Practices.
  - The methods of cultivation used by CMA.
● The methods of fertilization used by CMA.
● Integrated pest management and methods for recognizing the signs of insect infestation, pathogens and disease in marijuana plants, and the procedures for eradication and the safe disposal of plants so affected.
● Horticultural practices, including nutritional requirements of marijuana plants at various growth stages, including proper mixing and dispersal of fertilizer, flushing procedures and procedures for postharvest trimming, drying and curing.
● Personal Protective Equipment Training, including:
  ● When PPE is necessary.
  ● What PPE is necessary.
  ● How to properly adjust and wear PPE.
  ● The limitations of PPE.
  ● The proper care, maintenance, useful life, and disposal of PPE.
  ● Risk assessment and response.

CMA will maintain records of any training received and attendance records by the Chief Cultivation Officer. Each record of required training will include, at a minimum:
  ● Chief Cultivation Officer’s name and identification badge number.
  ● Signed statement from the Chief Cultivation Officer indicating the date, time, and place of training.
  ● Topics covered in training.
  ● Name and title of presenter(s).
  ● Certificate of attendance indicating satisfactory completion of training signed by presenter(s).

The Human Resources Manager will maintain all CMA training records and logs in each employee’s personnel file. All training documentation and personnel files will be made available for inspection by the Department and its authorized agents, upon request.

13. TBD, Cultivation Manager: CMA will ensure all employees have the education, training, and experience, or any combination thereof, to enable the employee to perform all assigned functions. The 2 hour training course developed by the Department must be completed prior to starting initial operation of a facility. The Cultivation Manager must receive at least twelve (12) hours of ongoing training annually or more often as necessary to maintain compliant, safe, and productive
operations, including the two-hour training course developed by the Department.

The Cultivation Manager must complete the two-hour training course developed by the Department within ninety (90) days after starting work at the Facility.

Training will include, at a minimum, the following:
- The provisions of the act and this part relevant to the responsibilities of principals and employees of grower/producers.
- Proper handling of medical marijuana.
- Proper recordkeeping.
- How to prevent and detect the diversion of medical marijuana.
- Best practice security procedures.
- Best practice safety procedures, including responding to the following:
  - A medical emergency.
  - A fire.
  - A chemical spill.
  - A threatening event including:
    - An armed robbery.
    - A burglary.
    - A criminal incident.
- CMA’s Employee Handbook.
- Commonwealth of Pennsylvania’s Workers’ Compensation system and benefits.
- HIPAA, ADA, EEOC, and other federal, state, and local laws, regulations, ordinances, and other requirements related to general business and the medical marijuana industry.
- The quality assurance duties of each employee related to CMA operations.
- Inventory management system and other IT and communications software and hardware information.
- Instructions regarding regulatory inspection preparedness and law enforcement interactions.
- Workplace safety training.
- Hazard communication training.

In addition to the above training, the Cultivation Manager must also be required to complete the following training components:
- Cultivation Training, including:
  - USDA Good Agricultural Practices.
  - The methods of cultivation used by CMA.
- The methods of fertilization used by CMA.
- Integrated pest management and methods for recognizing the signs of insect infestation, pathogens and disease in marijuana plants, and the procedures for eradication and the safe disposal of plants so affected.
- Horticultural practices, including nutritional requirements of marijuana plants at various growth stages, including proper mixing and dispersal of fertilizer, flushing procedures and procedures for postharvest trimming, drying and curing.

- Personal Protective Equipment Training, including:
  - When PPE is necessary.
  - What PPE is necessary.
  - How to properly adjust and wear PPE.
  - The limitations of PPE.
  - The proper care, maintenance, useful life, and disposal of PPE.
  - Risk assessment and response.

CMA will maintain records of any training received and attendance records by the Cultivation Manager. Each record of required training will include, at a minimum:
- Cultivation Manager's name and identification badge number.
- Signed statement from the Cultivation Manager indicating the date, time, and place of training.
- Topics covered in training.
- Name and title of presenter(s).
- Certificate of attendance indicating satisfactory completion of training signed by presenter(s).

The Human Resources Manager will maintain all CMA training records and logs in each employee's personnel file. All training documentation and personnel files will be made available for inspection by the Department and its authorized agents, upon request.

14. TBD, Harvest Manager: CMA will ensure all employees have the education, training, and experience, or any combination thereof, to enable the employee to perform all assigned functions. The 2 hour training course developed by the Department must be completed prior to starting initial operation of a facility. The Harvest Manager must receive at least twelve (12) hours of ongoing training annually or more often as necessary to maintain compliant, safe, and productive operations, including the two-hour training course developed by the Department.
The Harvest Manager must complete the two-hour training course developed by the Department within ninety (90) days after starting work at the Facility.

Training will include, at a minimum, the following:

- The provisions of the act and this part relevant to the responsibilities of principals and employees of grower/processors.
- Proper handling of medical marijuana.
- Proper recordkeeping.
- How to prevent and detect the diversion of medical marijuana.
- Best practice security procedures.
- Best practice safety procedures, including responding to the following:
  - A medical emergency.
  - A fire.
  - A chemical spill.
  - A threatening event including:
    - An armed robbery.
    - A burglary.
    - A criminal incident.
- CMA’s Employee Handbook.
- Commonwealth of Pennsylvania’s Workers’ Compensation system and benefits.
- HIPAA, ADA, EEOC, and other federal, state, and local laws, regulations, ordinances, and other requirements related to general business and the medical marijuana industry.
- The quality assurance duties of each employee related to CMA operations.
- Inventory management system and other IT and communications software and hardware information.
- Instructions regarding regulatory inspection preparedness and law enforcement interactions.
- Workplace safety training.
- Hazard communication training.

In addition to the above training, the Harvest Manager must also be required to complete the following training components:

- Cultivation Training, including:
  - USDA Good Agricultural Practices.
  - The methods of cultivation used by CMA.
  - The methods of fertilization used by CMA.
- Integrated pest management and methods for recognizing the signs of insect infestation, pathogens and disease in marijuana plants, and the procedures for eradication and the safe disposal of plants so affected.
- Horticultural practices, including nutritional requirements of marijuana plants at various growth stages, including proper mixing and dispersal of fertilizer, flushing procedures and procedures for postharvest trimming, drying and curing.
- Personal Protective Equipment Training, including:
  - When PPE is necessary.
  - What PPE is necessary.
  - How to properly adjust and wear PPE.
  - The limitations of PPE.
  - The proper care, maintenance, useful life, and disposal of PPE.
  - Risk assessment and response.

CMA will maintain records of any training received and attendance records by the Harvest Manager. Each record of required training will include, at a minimum:
- Harvest Manager’s name and identification badge number.
- Signed statement from the Harvest Manager indicating the date, time, and place of training.
- Topics covered in training.
- Name and title of presenter(s).
- Certificate of attendance indicating satisfactory completion of training signed by presenter(s).

The Human Resources Manager will maintain all CMA training records and logs in each employee's personnel file. All training documentation and personnel files will be made available for inspection by the Department and its authorized agents, upon request.

15. TBD, Packaging Manager: CMA will ensure all employees have the education, training, and experience, or any combination thereof, to enable the employee to perform all assigned functions. The 2 hour training course developed by the Department must be completed prior to starting initial operation of a facility. The Packaging Manager must receive at least twelve (12) hours of ongoing training annually or more often as necessary to maintain compliant, safe, and productive operations, including the two-hour training course developed by the Department.
The Packaging Manager must complete the two-hour training course developed by the Department within ninety (90) days after starting work at the Facility.

Training will include, at a minimum, the following:

- The provisions of the act and this part relevant to the responsibilities of principals and employees of grower/processors.
- Proper handling of medical marijuana.
- Proper recordkeeping.
- How to prevent and detect the diversion of medical marijuana.
- Best practice security procedures.
- Best practice safety procedures, including responding to the following:
  - A medical emergency.
  - A fire.
  - A chemical spill.
  - A threatening event including:
    - An armed robbery.
    - A burglary.
    - A criminal incident.
- CMA’s Employee Handbook.
- Commonwealth of Pennsylvania’s Workers’ Compensation system and benefits.
- HIPAA, ADA, EEOC, and other federal, state, and local laws, regulations, ordinances, and other requirements related to general business and the medical marijuana industry.
- The quality assurance duties of each employee related to CMA operations.
- Inventory management system and other IT and communications software and hardware information.
- Instructions regarding regulatory inspection preparedness and law enforcement interactions.
- Workplace safety training.
- Hazard communication training.

CMA will maintain records of any training received and attendance records by the Packaging Manager. Each record of required training will include, at a minimum:

- Packaging Manager’s name and identification badge number.
- Signed statement from the Packaging Manager indicating the date, time, and place of training.
• Topics covered in training.
• Name and title of presenter(s).
• Certificate of attendance indicating satisfactory completion of training signed by presenter(s).

The Human Resources Manager will maintain all CMA training records and logs in each employee’s personnel file. All training documentation and personnel files will be made available for inspection by the Department and its authorized agents, upon request.

16. TBD, Section Grower: CMA will ensure all employees have the education, training, and experience, or any combination thereof, to enable the employee to perform all assigned functions. The 2 hour training course developed by the Department must be completed prior to starting initial operation of a facility. The Section Grower must receive at least twelve (12) hours of ongoing training annually or more often as necessary to maintain compliant, safe, and productive operations, including the two-hour training course developed by the Department. The Section Grower must complete the two-hour training course developed by the Department within ninety (90) days after starting work at the Facility.

Training will include, at a minimum, the following:
• The provisions of the act and this part relevant to the responsibilities of principals and employees of grower/processors.
• Proper handling of medical marijuana.
• Proper recordkeeping.
• How to prevent and detect the diversion of medical marijuana.
• Best practice security procedures.
• Best practice safety procedures, including responding to the following:
  • A medical emergency.
  • A fire.
  • A chemical spill.
  • A threatening event including:
    • An armed robbery.
    • A burglary.
    • A criminal incident.
• CMA’s Employee Handbook.
• Commonwealth of Pennsylvania’s Workers’ Compensation system and benefits.
• HIPAA, ADA, EEOC, and other federal, state, and local laws, regulations, ordinances, and other requirements related to general business and the medical marijuana industry.
• The quality assurance duties of each employee related to CMA operations.
• Inventory management system and other IT and communications software and hardware information.
• Instructions regarding regulatory inspection preparedness and law enforcement interactions.
• Workplace safety training.
• Hazard communication training.

In addition to the above training, the Section Grower must also be required to complete the following training components:
• Cultivation Training, including:
  • USDA Good Agricultural Practices.
  • The methods of cultivation used by CMA.
  • The methods of fertilization used by CMA.
  • Integrated pest management and methods for recognizing the signs of insect infestation, pathogens and disease in marijuana plants, and the procedures for eradication and the safe disposal of plants so affected.
  • Horticultural practices, including nutritional requirements of marijuana plants at various growth stages, including proper mixing and dispersal of fertilizer, flushing procedures and procedures for postharvest trimming, drying and curing.
• Personal Protective Equipment Training, including:
  • When PPE is necessary.
  • What PPE is necessary.
  • How to properly adjust and wear PPE.
  • The limitations of PPE.
  • The proper care, maintenance, useful life, and disposal of PPE.
  • Risk assessment and response.

CMA will maintain records of any training received and attendance records by the Section Grower. Each record of required training will include, at a minimum:
• Section Grower’s name and identification badge number.
• Signed statement from the Section Grower indicating the date, time, and place of training.
• Topics covered in training.
The Human Resources Manager will maintain all CMA training records and logs in each employee’s personnel file. All training documentation and personnel files will be made available for inspection by the Department and its authorized agents, upon request.

17. TBD, Assistant Grower: CMA will ensure all employees have the education, training, and experience, or any combination thereof, to enable the employee to perform all assigned functions. The 2 hour training course developed by the Department must be completed prior to starting initial operation of a facility. The Assistant Grower must receive at least twelve (12) hours of ongoing training annually or more often as necessary to maintain compliant, safe, and productive operations, including the two-hour training course developed by the Department. The Assistant Grower must complete the two-hour training course developed by the Department within ninety (90) days after starting work at the Facility.

Training will include, at a minimum, the following:

- The provisions of the act and this part relevant to the responsibilities of principals and employees of grower/processors.
- Proper handling of medical marijuana.
- Proper recordkeeping.
- How to prevent and detect the diversion of medical marijuana.
- Best practice security procedures.
- Best practice safety procedures, including responding to the following:
  - A medical emergency.
  - A fire.
  - A chemical spill.
  - A threatening event including:
    - An armed robbery.
    - A burglary.
    - A criminal incident.
- CMA’s Employee Handbook.
- Commonwealth of Pennsylvania’s Workers’ Compensation system and benefits.
HIPAA, ADA, EEOC, and other federal, state, and local laws, regulations, ordinances, and other requirements related to general business and the medical marijuana industry.

The quality assurance duties of each employee related to CMA operations.

Inventory management system and other IT and communications software and hardware information.

Instructions regarding regulatory inspection preparedness and law enforcement interactions.

Workplace safety training.

Hazard communication training.

In addition to the above training, the Assistant Grower must also be required to complete the following training components:

- Cultivation Training, including:
  - USDA Good Agricultural Practices.
  - The methods of cultivation used by CMA.
  - The methods of fertilization used by CMA.
  - Integrated pest management and methods for recognizing the signs of insect infestation, pathogens and disease in marijuana plants, and the procedures for eradication and the safe disposal of plants so affected.
  - Horticultural practices, including nutritional requirements of marijuana plants at various growth stages, including proper mixing and dispersal of fertilizer, flushing procedures and procedures for postharvest trimming, drying and curing.

- Personal Protective Equipment Training, including:
  - When PPE is necessary.
  - What PPE is necessary.
  - How to properly adjust and wear PPE.
  - The limitations of PPE.
  - The proper care, maintenance, useful life, and disposal of PPE.
  - Risk assessment and response.

CMA will maintain records of any training received and attendance records by the Assistant Grower. Each record of required training will include, at a minimum:

- Assistant Grower's name and identification badge number.
- Signed statement from the Assistant Grower indicating the date, time, and place of training.
- Topics covered in training.
● Name and title of presenter(s).
● Certificate of attendance indicating satisfactory completion of training signed by presenter(s).

The Human Resources Manager will maintain all CMA training records and logs in each employee’s personnel file. All training documentation and personnel files will be made available for inspection by the Department and its authorized agents, upon request.

18. TBD, Grow Technician: CMA will ensure all employees have the education, training, and experience, or any combination thereof, to enable the employee to perform all assigned functions. The 2 hour training course developed by the Department must be completed prior to starting initial operation of a facility. The Grow Technician must receive at least twelve (12) hours of ongoing training annually or more often as necessary to maintain compliant, safe, and productive operations, including the two-hour training course developed by the Department. The Grow Technician must complete the two-hour training course developed by the Department within ninety (90) days after starting work at the Facility.

Training will include, at a minimum, the following:

● The provisions of the act and this part relevant to the responsibilities of principals and employees of grower/processors.
● Proper handling of medical marijuana.
● Proper recordkeeping.
● How to prevent and detect the diversion of medical marijuana.
● Best practice security procedures.
● Best practice safety procedures, including responding to the following:
  ● A medical emergency.
  ● A fire.
  ● A chemical spill.
  ● A threatening event including:
    ● An armed robbery.
    ● A burglary.
    ● A criminal incident.
● CMA’s Employee Handbook.
● Commonwealth of Pennsylvania’s Workers’ Compensation system and benefits.
• HIPAA, ADA, EEOC, and other federal, state, and local laws, regulations, ordinances, and other requirements related to general business and the medical marijuana industry.
• The quality assurance duties of each employee related to CMA operations.
• Inventory management system and other IT and communications software and hardware information.
• Instructions regarding regulatory inspection preparedness and law enforcement interactions.
• Workplace safety training.
• Hazard communication training.

In addition to the above training, the Grow Technician must also be required to complete the following training components:

• Cultivation Training, including:
  • USDA Good Agricultural Practices.
  • The methods of cultivation used by CMA.
  • The methods of fertilization used by CMA.
  • Integrated pest management and methods for recognizing the signs of insect infestation, pathogens and disease in marijuana plants, and the procedures for eradication and the safe disposal of plants so affected.
  • Horticultural practices, including nutritional requirements of marijuana plants at various growth stages, including proper mixing and dispersal of fertilizer, flushing procedures and procedures for postharvest trimming, drying and curing.

• Personal Protective Equipment Training, including:
  • When PPE is necessary.
  • What PPE is necessary.
  • How to properly adjust and wear PPE.
  • The limitations of PPE.
  • The proper care, maintenance, useful life, and disposal of PPE.
  • Risk assessment and response.

CMA will maintain records of any training received and attendance records by the Grow Technician. Each record of required training will include, at a minimum:

• Grow Technician’s name and identification badge number.
• Signed statement from the Grow Technician indicating the date, time, and place of training.
• Topics covered in training.
- Name and title of presenter(s).
- Certificate of attendance indicating satisfactory completion of training signed by presenter(s).

The Human Resources Manager will maintain all CMA training records and logs in each employee's personnel file. All training documentation and personnel files will be made available for inspection by the Department and its authorized agents, upon request.

19. TBD, Trimmer: CMA will ensure all employees have the education, training, and experience, or any combination thereof, to enable the employee to perform all assigned functions. The 2 hour training course developed by the Department must be completed prior to starting initial operation of a facility. The Trimmer must receive at least twelve (12) hours of ongoing training annually or more often as necessary to maintain compliant, safe, and productive operations, including the two-hour training course developed by the Department. The Trimmer must complete the two-hour training course developed by the Department within ninety (90) days after starting work at the Facility.

Training will include, at a minimum, the following:
- The provisions of the act and this part relevant to the responsibilities of principals and employees of grower/processors.
- Proper handling of medical marijuana.
- Proper recordkeeping.
- How to prevent and detect the diversion of medical marijuana.
- Best practice security procedures.
- Best practice safety procedures, including responding to the following:
  - A medical emergency.
  - A fire.
  - A chemical spill.
  - A threatening event including:
    - An armed robbery.
    - A burglary.
    - A criminal incident.
- CMA’s Employee Handbook.
- Commonwealth of Pennsylvania's Workers' Compensation system and benefits.
- HIPAA, ADA, EEOC, and other federal, state, and local laws, regulations, ordinances, and other requirements related to general business and the medical marijuana industry.
- The quality assurance duties of each employee related to CMA operations.
- Inventory management system and other IT and communications software and hardware information.
- Instructions regarding regulatory inspection preparedness and law enforcement interactions.
- Workplace safety training.
- Hazard communication training.

CMA will maintain records of any training received and attendance records by the Trimmer. Each record of required training will include, at a minimum:
- Trimmer’s name and identification badge number.
- Signed statement from the Trimmer indicating the date, time, and place of training.
- Topics covered in training.
- Name and title of presenter(s).
- Certificate of attendance indicating satisfactory completion of training signed by presenter(s).

The Human Resources Manager will maintain all CMA training records and logs in each employee’s personnel file. All training documentation and personnel files will be made available for inspection by the Department and its authorized agents, upon request.

20. TBD, Extraction Technician: CMA will ensure all employees have the education, training, and experience, or any combination thereof, to enable the employee to perform all assigned functions. The 2 hour training course developed by the Department must be completed prior to starting initial operation of a facility. The Extraction Technician must receive at least twelve (12) hours of ongoing training annually or more often as necessary to maintain compliant, safe, and productive operations, including the two-hour training course developed by the Department. The Extraction Technician must complete the two-hour training course developed by the Department within ninety (90) days after starting work at the Facility.

Training will include, at a minimum, the following:
● The provisions of the act and this part relevant to the responsibilities of principals and employees of grower/processors.
● Proper handling of medical marijuana.
● Proper recordkeeping.
● How to prevent and detect the diversion of medical marijuana.
● Best practice security procedures.
● Best practice safety procedures, including responding to the following:
  ● A medical emergency.
  ● A fire.
  ● A chemical spill.
  ● A threatening event including:
    ● An armed robbery.
    ● A burglary.
    ● A criminal incident.
● CMA’s Employee Handbook.
● Commonwealth of Pennsylvania’s Workers’ Compensation system and benefits.
● HIPAA, ADA, EEOC, and other federal, state, and local laws, regulations, ordinances, and other requirements related to general business and the medical marijuana industry.
● The quality assurance duties of each employee related to CMA operations.
● Inventory management system and other IT and communications software and hardware information.
● Instructions regarding regulatory inspection preparedness and law enforcement interactions.
● Workplace safety training.
● Hazard communication training.

CMA will maintain records of any training received and attendance records by the Extraction Technician. Each record of required training will include, at a minimum:
● Extraction Technician’s name and identification badge number.
● Signed statement from the Extraction Technician indicating the date, time, and place of training.
● Topics covered in training.
● Name and title of presenter(s).
● Certificate of attendance indicating satisfactory completion of training signed by presenter(s).
The Human Resources Manager will maintain all CMA training records and logs in each employee’s personnel file. All training documentation and personnel files will be made available for inspection by the Department and its authorized agents, upon request.

21. TBD, Lab Technician: CMA will ensure all employees have the education, training, and experience, or any combination thereof, to enable the employee to perform all assigned functions. The 2 hour training course developed by the Department must be completed prior to starting initial operation of a facility. The Lab Technician must receive at least twelve (12) hours of ongoing training annually or more often as necessary to maintain compliant, safe, and productive operations, including the two-hour training course developed by the Department. The Lab Technician must complete the two-hour training course developed by the Department within ninety (90) days after starting work at the Facility.

Training will include, at a minimum, the following:

- The provisions of the act and this part relevant to the responsibilities of principals and employees of grower/processors.
- Proper handling of medical marijuana.
- Proper recordkeeping.
- How to prevent and detect the diversion of medical marijuana.
- Best practice security procedures.
- Best practice safety procedures, including responding to the following:
  - A medical emergency.
  - A fire.
  - A chemical spill.
  - A threatening event including:
    - An armed robbery.
    - A burglary.
    - A criminal incident.
- CMA’s Employee Handbook.
- Commonwealth of Pennsylvania’s Workers’ Compensation system and benefits.
- HIPAA, ADA, EEOC, and other federal, state, and local laws, regulations, ordinances, and other requirements related to general business and the medical marijuana industry.
- The quality assurance duties of each employee related to CMA operations.
- Inventory management system and other IT and communications software and hardware information.
- Instructions regarding regulatory inspection preparedness and law enforcement interactions.
- Workplace safety training.
- Hazard communication training.

Additional Quality Assurance Training, including:
- Fundamentals of quality systems.
- Developing standard operating procedures.
- Continual improvement assessment.

CMA will maintain records of any training received and attendance records by the Lab Technician. Each record of required training will include, at a minimum:

- Lab Technician’s name and identification badge number.
- Signed statement from the Lab Technician indicating the date, time, and place of training.
- Topics covered in training.
- Name and title of presenter(s).
- Certificate of attendance indicating satisfactory completion of training signed by presenter(s).

The Human Resources Manager will maintain all CMA training records and logs in each employee’s personnel file. All training documentation and personnel files will be made available for inspection by the Department and its authorized agents, upon request.

22. TBD, Processing & Manufacturing Technician: CMA will ensure all employees have the education, training, and experience, or any combination thereof, to enable the employee to perform all assigned functions. The 2 hour training course developed by the Department must be completed prior to starting initial operation of a facility. The Processing & Manufacturing Technician must receive at least twelve (12) hours of ongoing training annually or more often as necessary to maintain compliant, safe, and productive operations, including the two-hour training course developed by the Department. The Processing & Manufacturing must complete the two-hour training course developed by the Department within ninety (90) days after starting work at the Facility.
Training will include, at a minimum, the following:

- The provisions of the act and this part relevant to the responsibilities of principals and employees of grower/processors.
- Proper handling of medical marijuana.
- Proper recordkeeping.
- How to prevent and detect the diversion of medical marijuana.
- Best practice security procedures.
- Best practice safety procedures, including responding to the following:
  - A medical emergency.
  - A fire.
  - A chemical spill.
  - A threatening event including:
    - An armed robbery.
    - A burglary.
    - A criminal incident.
- CMA’s Employee Handbook.
- Commonwealth of Pennsylvania’s Workers’ Compensation system and benefits.
- HIPAA, ADA, EEOC, and other federal, state, and local laws, regulations, ordinances, and other requirements related to general business and the medical marijuana industry.
- The quality assurance duties of each employee related to CMA operations.
- Inventory management system and other IT and communications software and hardware information.
- Instructions regarding regulatory inspection preparedness and law enforcement interactions.
- Workplace safety training.
- Hazard communication training.

CMA will maintain records of any training received and attendance records by the Processing & Manufacturing Technician. Each record of required training will include, at a minimum:

- Processing & Manufacturing Technician’s name and identification badge number.
- Signed statement from the Processing & Manufacturing Technician indicating the date, time, and place of training.
The Human Resources Manager will maintain all CMA training records and logs in each employee’s personnel file. All training documentation and personnel files will be made available for inspection by the Department and its authorized agents, upon request.

23. TBD, Inventory Technician: CMA will ensure all employees have the education, training, and experience, or any combination thereof, to enable the employee to perform all assigned functions. The 2 hour training course developed by the Department must be completed prior to starting initial operation of a facility. The Inventory Technician must receive at least twelve (12) hours of ongoing training annually or more often as necessary to maintain compliant, safe, and productive operations, including the two-hour training course developed by the Department. The Inventory Technician must complete the two-hour training course developed by the Department within ninety (90) days after starting work at the Facility.

Training will include, at a minimum, the following:

- The provisions of the act and this part relevant to the responsibilities of principals and employees of grower/processors.
- Proper handling of medical marijuana.
- Proper recordkeeping.
- How to prevent and detect the diversion of medical marijuana.
- Best practice security procedures.
- Best practice safety procedures, including responding to the following:
  - A medical emergency.
  - A fire.
  - A chemical spill.
  - A threatening event including:
    - An armed robbery.
    - A burglary.
    - A criminal incident.
- CMA’s Employee Handbook.
- Commonwealth of Pennsylvania’s Workers’ Compensation system and benefits.
● HIPAA, ADA, EEOC, and other federal, state, and local laws, regulations, ordinances, and other requirements related to general business and the medical marijuana industry.
● The quality assurance duties of each employee related to CMA operations.
● Inventory management system and other IT and communications software and hardware information.
● Instructions regarding regulatory inspection preparedness and law enforcement interactions.
● Workplace safety training.
● Hazard communication training.

CMA will maintain records of any training received and attendance records by the Inventory Technician. Each record of required training will include, at a minimum:
● Inventory Technician’s name and identification badge number.
● Signed statement from the Inventory Technician indicating the date, time, and place of training.
● Topics covered in training.
● Name and title of presenter(s).
● Certificate of attendance indicating satisfactory completion of training signed by presenter(s).

The Human Resources Manager will maintain all CMA training records and logs in each employee’s personnel file. All training documentation and personnel files will be made available for inspection by the Department and its authorized agents, upon request.

24. TBD, Director of Quality Assurance: CMA will ensure all employees have the education, training, and experience, or any combination thereof, to enable the employee to perform all assigned functions. The 2 hour training course developed by the Department must be completed prior to starting initial operation of a facility. The Director of Quality Assurance must receive at least twelve (12) hours of ongoing training annually or more often as necessary to maintain compliant, safe, and productive operations, including the two-hour training course developed by the Department. The Director of Quality Assurance must complete the two-hour training course developed by the Department within ninety (90) days after starting work at the Facility.
Training will include, at a minimum, the following:

- The provisions of the act and this part relevant to the responsibilities of principals and employees of grower/processors.
- Proper handling of medical marijuana.
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- The quality assurance duties of each employee related to CMA operations.
- Inventory management system and other IT and communications software and hardware information.
- Instructions regarding regulatory inspection preparedness and law enforcement interactions.
- Workplace safety training.
- Hazard communication training.

Additional Quality Assurance Training, including:

- Fundamentals of quality systems.
- Developing standard operating procedures.
- Continual improvement assessment.

CMA will maintain records of any training received and attendance records by the Director of Quality Assurance. Each record of required training will include, at a minimum:

- Director of Quality Assurance’s name and identification badge number.
- Signed statement from the Director of Quality Assurance indicating the date, time, and place of training.
- Topics covered in training.
- Name and title of presenter(s).
- Certificate of attendance indicating satisfactory completion of training signed by presenter(s).

The Human Resources Manager will maintain all CMA training records and logs in each employee’s personnel file. All training documentation and personnel files will be made available for inspection by the Department and its authorized agents, upon request.

25. TBD, Packaging & Shipping Technician: CMA will ensure all employees have the education, training, and experience, or any combination thereof, to enable the employee to perform all assigned functions. The 2 hour training course developed by the Department must be completed prior to starting initial operation of a facility. The Packaging & Shipping Technician must receive at least twelve (12) hours of ongoing training annually or more often as necessary to maintain compliant, safe, and productive operations, including the two-hour training course developed by the Department. The Packaging & Shipping Technician must complete the two-hour training course developed by the Department within ninety (90) days after starting work at the Facility.

Training will include, at a minimum, the following:
- The provisions of the act and this part relevant to the responsibilities of principals and employees of growerprocessors.
- Proper handling of medical marijuana.
- Proper recordkeeping.
- How to prevent and detect the diversion of medical marijuana.
- Best practice security procedures.
- Best practice safety procedures, including responding to the following:
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• The quality assurance duties of each employee related to CMA operations.
• Inventory management system and other IT and communications software and hardware information.
• Instructions regarding regulatory inspection preparedness and law enforcement interactions.
• Workplace safety training.
• Hazard communication training.

In addition to the above training, the Packaging & Shipping Technician must also be required to complete the following training components:
• Vehicle safety.
• Cargo theft prevention measures.
• Employee and visitor access procedures.
• Camera monitoring and safety systems.
• Suspicious behavior and incident identification.
• Incident management and reporting.
• Risk assessment and response.

CMA will maintain records of any training received and attendance records by the Packaging & Shipping Technician. Each record of required training will include, at a minimum:
• Packaging & Shipping Technician’s name and identification badge number.
• Signed statement from the Packaging & Shipping Technician indicating the date, time, and place of training.
• Topics covered in training.
• Name and title of presenter(s).
• Certificate of attendance indicating satisfactory completion of training signed by presenter(s).
The Human Resources Manager will maintain all CMA training records and logs in each employee’s personnel file. All training documentation and personnel files will be made available for inspection by the Department and its authorized agents, upon request.

26. TBD, Security Officer: CMA will ensure all employees have the education, training, and experience, or any combination thereof, to enable the employee to perform all assigned functions. The 2 hour training course developed by the Department must be completed prior to starting initial operation of a facility. The Security Officer must receive at least twelve (12) hours of ongoing training annually or more often as necessary to maintain compliant, safe, and productive operations, including the two-hour training course developed by the Department. The Security Officer must complete the two-hour training course developed by the Department within ninety (90) days after starting work at the Facility.

Training will include, at a minimum, the following:

- The provisions of the act and this part relevant to the responsibilities of principals and employees of grower/processors.
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- The quality assurance duties of each employee related to CMA operations.
- Inventory management system and other IT and communications software and hardware information.
- Instructions regarding regulatory inspection preparedness and law enforcement interactions.
- Workplace safety training.
- Hazard communication training.

In addition to the above training, Security Officers must also be required to complete the following training components in coordination with the Director of Security:
- Employee and visitor access procedures.
- Camera monitoring and safety systems.
- Suspicious behavior and incident identification.
- Incident management and reporting.
- Risk assessment and response.

CMA will maintain records of any training received and attendance records by the Security Officer. Each record of required training will include, at a minimum:
- Security Officer’s name and identification badge number.
- Signed statement from the Security Officer indicating the date, time, and place of training.
- Topics covered in training.
- Name and title of presenter(s).
- Certificate of attendance indicating satisfactory completion of training signed by presenter(s).

The Human Resources Manager will maintain all CMA training records and logs in each employee’s personnel file. All training documentation and personnel files will be made available for inspection by the Department and its authorized agents, upon request.
Section 8 - Operational Timetable Contd.

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 products.

CMA is uniquely qualified to become operational inside of the required six-month timeline. Our COO, Morgan Carr, has built multiple medical marijuana businesses under similar deadlines in multiple states. There is no substitution for this hand’s-on experience in the licensed medical marijuana space—navigating local and state laws, working with government officials and contractors, and listening to community, law enforcement and patient needs while executing the project in a timely and professional fashion. Mr. Carr has also operated medical marijuana businesses in several states for years, enabling him to expertly establish both cultivation designs and procedures to safeguard the handling, storing, and transporting of medical marijuana. Mr. Carr, working with the Medical Director and Security staff, will personally train all employees on company procedures highlighting his hand’s-on experience to safeguard patient medicine and prevent contamination or diversion.

CMA’s CEO, Tip Paul, owns and manages a longstanding manufacturing business in Pittsburgh and for decades, the company has demonstrated experience in providing quality products under rigorous deadlines. Established in 2010 in Colorado, CMA’s legal team, Vicente Sederberg, LLC, has helped hundreds of medical marijuana businesses successfully navigate local and state regulations to establish businesses that are models for both public safety and the patient population. Vicente Sederberg’s staff has served on government medical marijuana workgroups addressing “best practices” for transportation, product labeling, and child-resistant packaging.

<table>
<thead>
<tr>
<th>Activity</th>
<th>Estimated Date</th>
</tr>
</thead>
<tbody>
<tr>
<td>Submit Grower/Processor Application to the Department of Health.</td>
<td>03/20/2017</td>
</tr>
<tr>
<td>Request bids for construction.</td>
<td>4/1/2017</td>
</tr>
<tr>
<td>Continue facility improvements including cleaning, replacing ceilings,</td>
<td>4/15/2017</td>
</tr>
<tr>
<td>and installing new flooring.</td>
<td></td>
</tr>
<tr>
<td>Permit awarded.</td>
<td>5/1/2017</td>
</tr>
<tr>
<td>Apply for a building permit with the Building Department</td>
<td>5/2/2017</td>
</tr>
<tr>
<td>Obtain and review final bids for construction vendors</td>
<td>5/2/2017</td>
</tr>
<tr>
<td>Award construction vendor contacts</td>
<td>5/5/2017</td>
</tr>
<tr>
<td>Secure local approval to begin construction including building permit</td>
<td>5/15/17</td>
</tr>
<tr>
<td>(certificate of occupancy already obtained)</td>
<td></td>
</tr>
<tr>
<td>Begin retro fit construction at facility (HVAC and electrical)</td>
<td>5/16/2017</td>
</tr>
<tr>
<td>Request bids for security equipment (RFP)</td>
<td>5/20/17</td>
</tr>
<tr>
<td>Task</td>
<td>Date</td>
</tr>
<tr>
<td>----------------------------------------------------------------------</td>
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</tr>
<tr>
<td>Solicit and recruit employees according to Diversity Plan (Section 3) including participating in a job fair</td>
<td>6/1/2017</td>
</tr>
<tr>
<td>Award contract for security</td>
<td>6/10/2017</td>
</tr>
<tr>
<td>Facility buildout complete</td>
<td>7/1/2017</td>
</tr>
<tr>
<td>Invite local law enforcement and local officials to an open forum to educate on our business and address and issues or questions, including our security and diversion prevention procedures.</td>
<td>7/10/2017</td>
</tr>
<tr>
<td>Install computers, and other office supplies needed.</td>
<td>7/15/2017</td>
</tr>
<tr>
<td>Install cultivation equipment and set up cultivation work room</td>
<td>7/18/2017</td>
</tr>
</tbody>
</table>

DOH REDACTED
<table>
<thead>
<tr>
<th>Event Description</th>
<th>Date</th>
</tr>
</thead>
<tbody>
<tr>
<td>Contract with waste disposal company to handle all medical marijuana and hazardous waste.</td>
<td>7/18/2017</td>
</tr>
<tr>
<td>Purchase vehicle to be used for transportation and install security equipment and storage in vehicle.</td>
<td>7/20/2017</td>
</tr>
<tr>
<td>Hire management and support team and begin training. Internal training for all employees including provisions of the Act and Regulations relevant to the operation, proper handling of medical marijuana, proper recordkeeping, how to prevent and detect diversion, best practice security and safety procedures, CMA's employee handbook, worker's compensation, HIPAA, ADA, EEOC and other federal, state, and local laws and regulation, quality assurance, inventory management, regulatory inspection and compliance, and workplace safety.</td>
<td>8/1/2017</td>
</tr>
<tr>
<td>Contract with an independent testing laboratory for testing needs and obtain letter of intent.</td>
<td>8/1/2017</td>
</tr>
<tr>
<td>Department inspection of premises.</td>
<td>8/15/2017</td>
</tr>
<tr>
<td>Register employees with Department and have employees complete Department training course.</td>
<td>8/16/2017</td>
</tr>
<tr>
<td>Final permit awarded. Now &quot;Operational&quot;.</td>
<td>8/20/2017</td>
</tr>
<tr>
<td>Engage community by hosting a education forum to address any concerns or questions</td>
<td>8/21/2017</td>
</tr>
<tr>
<td>Begin cultivation of medical marijuana plants.</td>
<td>8/22/2017</td>
</tr>
<tr>
<td>Bring in starter plants and seeds.</td>
<td>8/22/2017</td>
</tr>
<tr>
<td>Start seeds, start vegetative growth for “Mother” plants.</td>
<td>8/23/2017</td>
</tr>
<tr>
<td>Clone “Mother” plants for first production batch.</td>
<td>9/13/2017</td>
</tr>
<tr>
<td>Begin vegetative stage for the clones - 8 weeks to flower.</td>
<td>9/13/2017</td>
</tr>
<tr>
<td>30-day window for bringing in plants and seeds is finished.</td>
<td>9/22/2017</td>
</tr>
<tr>
<td>Install extraction and processing equipment.</td>
<td>10/10/2017</td>
</tr>
<tr>
<td>Order child proof packaging and final packaging design process; Obtain approval from the Department for labels and packaging.</td>
<td>10/20/2017</td>
</tr>
<tr>
<td>First production batch goes into flower.</td>
<td>11/13/2017</td>
</tr>
<tr>
<td>Event</td>
<td>Date</td>
</tr>
<tr>
<td>----------------------------------------------------------------------</td>
<td>------------</td>
</tr>
<tr>
<td>Second production batch goes into flower.</td>
<td>11/20/17</td>
</tr>
<tr>
<td>Prepare drying and curing room for first harvest.</td>
<td>12/1/17</td>
</tr>
<tr>
<td>1st production batch harvest, weekly harvest from then on - every Monday there will be a harvest.</td>
<td>1/15/18</td>
</tr>
<tr>
<td>Begin drying and curing period for 1st batch.</td>
<td>1/16/18</td>
</tr>
<tr>
<td>2nd production batch harvest.</td>
<td>1/22/18</td>
</tr>
<tr>
<td>Finish drying and curing, move to extraction stage.</td>
<td>1/30/18</td>
</tr>
<tr>
<td>Begin critical CO₂ extraction of medical marijuana for medical marijuana products, refine as needed.</td>
<td>1/31/2018</td>
</tr>
<tr>
<td>Begin processing concentrated CO₂ extracted cannabis into medical products.</td>
<td>2/2/2018</td>
</tr>
<tr>
<td>Send samples of medical marijuana products to independent testing laboratory.</td>
<td>2/4/2018</td>
</tr>
<tr>
<td>Receive testing results from test facility.</td>
<td>2/8/18</td>
</tr>
<tr>
<td>Package and label products that have passed testing for shipment.</td>
<td>2/9/18</td>
</tr>
<tr>
<td>Generate transport manifest for first shipment of product to licensed dispensary.</td>
<td>2/11/18</td>
</tr>
<tr>
<td>First delivery of products to dispensary.</td>
<td>2/12/18</td>
</tr>
<tr>
<td>Products ready for sale to patients at dispensary.</td>
<td>2/20/18</td>
</tr>
</tbody>
</table>
Provide the position, title in the Applicant’s business, and address information for all current officers, directors, partners or trustees

<table>
<thead>
<tr>
<th>Name and Residential Address</th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>First Name</strong>: Lucas</td>
<td><strong>Middle Name</strong>: Hays</td>
</tr>
<tr>
<td><strong>Occupation</strong>: General Manager</td>
<td><strong>Title in the Applicant’s Business</strong>: Director of Facilities</td>
</tr>
<tr>
<td>Also known as: N/A</td>
<td>Date of Birth: DOH REDACTED</td>
</tr>
<tr>
<td>Address Line 1: DOH REDACTED</td>
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<tr>
<td>Address Line 3:</td>
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<tr>
<td><strong>First Name</strong>: Heather</td>
<td><strong>Middle Name</strong>: Leigh</td>
</tr>
<tr>
<td><strong>Occupation</strong>: Management Consultant</td>
<td><strong>Title in the Applicant’s Business</strong>: Director of IT</td>
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<td><strong>First Name</strong>: Brian</td>
<td><strong>Middle Name</strong>: Peter</td>
</tr>
<tr>
<td><strong>Occupation</strong>: Attorney</td>
<td><strong>Title in the Applicant’s Business</strong>: Director of Regulatory &amp; Compliance Affairs</td>
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<tr>
<td><strong>First Name</strong>: Patricia</td>
<td><strong>Middle Name</strong>: Eugenia</td>
</tr>
<tr>
<td><strong>Occupation</strong>: International Controller</td>
<td><strong>Title in the Applicant’s Business</strong>: Human Resources Manager</td>
</tr>
<tr>
<td>Also known as: Patricia Ahumada</td>
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