STATE OF FLORIDA
DEPARTMENT OF HEALTH

Application for Low-THC Cannabis Dispensing Organization Approval

This Application for Low-THC Cannabis Dispensing Organization Approval (Application) is designed to allow the Florida Department of Health, Office of Compassionate Use (OCU) to fulfill its statutory duty to select the five Dispensing Organizations meeting the requirements of section 381.986(5)(b), F.S. (Statute), best able to further the statutory objective of ensuring accessibility and availability of Low-THC cannabis to patients. This has been further clarified to mean that OCU must choose the most dependable, most qualified dispensing organizations that can consistently deliver high-quality Derivative Products. It is important for each Applicant to remember that the Applicant is competing with other Applicants, not with any mandatory minimum criteria set by the OCU. The criteria used to determine which Applicants are selected are drawn directly from the Statute. The items requested in Rule 64-4.002, F.A.C., Initial Application Requirements for Dispensing Organizations (Rule) and this Application are designed to guide OCU in its determination of the most qualified Applicants that can ensure accessibility and availability of Derivative Products by dependably and consistently delivering high-quality Derivative Products.

This Application is divided into four parts:

I. Part I requires the Applicant to provide basic information about the Applicant and Application.
II. Part II requires the Applicant to document its compliance with requirements mandated by the Statute.
III. Part III requires the Applicant to provide the OCU with all items listed in the Rule. Part III is organized differently than the Rule because it is organized based on the scoring system OCU will use to evaluate Applications. Each individual item listed in the Rule and the Application is not mandatory but is designed to elicit information from the Applicant that will assist the OCU in making its selection. Part III is organized as follows:

A. Cultivation (30%)
   1. Technical Ability (4.002(2)(a)) [25%]
   2. Infrastructure (4.002(2)(e)) [25%]
   3. Premises Resources Personnel (4.002(2)(c)) [25%]
   4. Accountability (4.002(2)(d)) [25%]

B. Processing (30%)
   1. Technical Ability (4.002(2)(a)) [25%]
   2. Infrastructure (4.002(2)(e)) [25%]
   3. Premises Resources Personnel (4.002(2)(c)) [25%]
   4. Accountability (4.002(2)(d)) [25%]

C. Dispensing (15%)
   1. Technical Ability (4.002(2)(a)) [25%]
   2. Infrastructure (4.002(2)(e)) [25%]
   3. Premises Resources Personnel (4.002(2)(c)) [25%]
   4. Accountability (4.002(2)(d)) [25%]

D. Medical Director (5%)

E. Financials (20%)

IV. Part IV explains how to submit an application, including the application fee.

For OCU review purposes, please be sure to organize the Application so that each document submitted with the Application is labeled accurately with the Part number and sub-Part number of the Application to which it corresponds. The better organized the Application is, the easier it will be to evaluate.

Part I

Application Type: ☒ **Initial Application** ☐ **Renewal Application**

Dispensing Region: ☐ **Northwest** ☒ **Northeast** ☐ **Central** ☐ **Southwest** ☐ **Southeast**

Nursery:

Name: Chestnut Hill Tree Farm, LLC
(Unless an individual, the organization name must be registered with the Department of State)

DACS Certificate Address: 15105 NW 94th Ave., Alachua, FL 32615
Street Address City Zip Code

Mailing Address (if different): _____
P.O. Box or Street Address City Zip Code

Phone Number: (352) 219-5825 E-mail Address: chnuts@gmail.com

Nurseryman:

Operating Nurseryman: Robert D. Wallace

Mailing Address: 15105 NW 94th Ave., Alachua, FL 32615
P.O. Box or Street Address City Zip Code

Phone Number: (352) 219-5825 E-mail Address: chnuts@gmail.com

Medical Director:

Name: Dr. Richard Tempel

Mailing Address: 1350 Celebration Ave., Celebration, FL 34747
P.O. Box or Street Address City Zip Code

Phone Number: (407) 756-3717 E-mail Address: drtempel@gmail.com

License Number: ME102329

Part II

The following information must be submitted and is required by the Statute. A failure to submit the information required by Part II will result in the application being denied prior to any scoring as contemplated in rule 64-4.002(5), F.A.C.

A. Please submit documentation sufficient to establish the Applicant meets the requirements of Section 381.986(5)(b)1., F.S., specifically:
   1. Certification by the Florida Department of Agriculture and Consumer Services for the cultivation of more than 400,000 plants; and
   2. Operation as a nursery in this state for at least 30 continuous years.

B. Please submit documentation sufficient to establish that all owners and managers of the Applicant (and proposed Dispensing Organization) have been fingerprinted and have successfully passed a level 2 background screening pursuant to section 435.04, F.S.
   1. As stated in rule 64-4.002(2)(g), F.A.C., this requirement can be satisfied by each owner or manager presenting to FDLE or one of its approved vendors for fingerprinting. At that time, give the entity ORI number FL924890Z (DOH – OFFICE OF COMPASSIONATE USE) to FDLE or its approved vendor. The report will be sent directly to the Office of Compassionate Use.
   2. Please submit a list of all owners and managers indicating the date of each individual's most recent level-2 background screening described above.

Part III

Please attach the documentation that provides the information listed in Rule 64-4.002 including (when appropriate) the name, position, and resume' of the employee(s) who provides the knowledge or experience explained for each item shown below:

A. Cultivation (30%)
   1. Technical Ability (4.002(2)(a)) [25%]
      a. Experience cultivating cannabis;
      b. Experience cultivating in Florida plants not native to Florida;
      c. Experience introducing new varieties of plants;
      d. Regional cultivation knowledge and experience;
      e. Experience cultivating plants for human consumption such as food or medicine products;
      f. Experience with in-house propagation;
      g. Experience with genetic modification or breeding;

h. Experience using clean growing rooms;
i. Knowledge of cannabis cultivation, including:
    i. Proper cultivation conditions and techniques;
    ii. Additives that can be used when growing cannabis;
    iii. Pests, disease and deficiencies common for cannabis;
    iv. Production of high quality product in a short time;
j. Experience with tracking each plant in a harvest;
k. Experience with good agricultural practices;
l. Experience with good handling practices;
m. Experience with recalls; and
n. Any awards, recognition or certifications received for relevant expertise.

2. Infrastructure (4.002(2)(e)) [25%]
    a. Vehicles that will be used to transport product among cultivating, processing, and dispensing facilities;
    b. Communication systems; and
    c. Methods of mitigating odors if applicable.
3. Premises, Resources, Personnel (4.002(2)(c)) [25%]
    a. Location of all properties Applicant proposes to utilize to cultivate low-THC cannabis, including ownership information for the properties and any lease terms if applicable:
        i. For any property that is leased by the Applicant, include documentation that the property owner consents to the use of the property for the purposes of cultivation of low-THC cannabis and documentation that the mortgagor or lienholder has been given notice of the use of the property for the purpose of cultivation of low-THC cannabis; and
        ii. For any property owned by the Applicant but subject to a mortgage or lien, include documentation that the mortgagor or lienholder has been notified of the use of the property for the purpose of cultivation of low-THC cannabis.
    b. Compliance with local regulations regarding sanitation and waste disposal;
    c. The ability to obtain zoning approval;
    d. Sketch or other illustration approximating the property boundaries, land topography, vegetation, proposed and/or existing structures, easements, wells, and roadways for each cultivation property proposed;
    e. Description of the areas proposed for the cultivation of low-THC cannabis, including the following:
        i. Capacity, in square feet of growing area;
        ii. Cultivation environment, e.g., greenhouse, clean room, aseptic, et cetera;
        iii. Irrigation system(s); and
        iv. Environmental control system(s).
    f. A description of the ability or plan to expand any of the areas proposed for cultivating low-THC cannabis;
    g. Back-up systems for all cultivation systems;
    h. A description of one or more strains of low-THC cannabis the applicant intends to cultivate;

i. Access to water resources that allow for sufficient irrigation;
j. A list of current and proposed staffing for cultivation, including:
    i. Position, duties and responsibilities;
    ii. Resume; and
    iii. Professional licensure disciplinary action in all jurisdictions.
k. An organizational chart illustrating the supervisory structure of the cultivation function of the proposed Dispensing Organization;
l. Plans and procedures for loss of key personnel;
m. Plans and procedures for complying with OSHA regulations for workplace safety.

4. Accountability (4.002(2)(d)) [25%]
    a. Floor plan of each cultivation facility or proposed floor plans for proposed cultivation facilities, including the following:
        i. Locking options for each means of ingress and egress;
        ii. Alarm systems;
        iii. Video surveillance;
        iv. Name and function of each room; and
        v. Layout and dimensions of each room.
    b. Storage, including the following:
        i. Safes;
        ii. Vaults; and
        iii. Climate control.
    c. Diversion and trafficking prevention procedures;
    d. A facility emergency management plan;
    e. System for tracking low-THC source plant material throughout cultivation;
    f. Inventory control system for low-THC cannabis;
    g. Policies and procedures for recordkeeping;
    h. Methods of screening and monitoring employees;
    i. Personnel qualifications and experience with chain of custody or other tracking mechanisms;
    j. Personnel reserved solely for inventory control purposes;
    k. Personnel reserved solely for security purposes;
    l. Waste disposal plan; and
    m. Access to specialized resources or expertise regarding data collection, security, and tracking.

B. Processing (30%)

1. Technical Ability (4.002(2)(a)) [25%]
    a. Experience with good manufacturing practices;
    b. Experience with analytical, organic chemistry, and micro-biology;
    c. Experience with analytical laboratory methods;
    d. Experience with analytical laboratory quality control, including maintaining a chain of custody;
    e. Knowledge of, and experience with, cannabis extraction techniques;
    f. Knowledge of cannabis routes of administration;
    g. Experience with recalls;
    h. Knowledge of, and experience with, producing cannabis products; and

i. Any awards, recognition or certifications received for relevant expertise.

2. Infrastructure (4.002(2)(e)) [25%]
    a. Vehicles that will be used to transport product among cultivating, processing, and dispensing facilities;
    b. Communication systems; and
    c. Methods of mitigating odors if applicable.
3. Premises, Resources, Personnel (4.002(2)(c)) [25%]
    a. Location of all properties Applicant proposes to utilize to process low-THC cannabis and Derivative Products, including ownership information for the properties and any lease terms if applicable:
        i. For any property that is leased by the Applicant, include documentation that the property owner consents to the use of the property for the purposes of processing of low-THC cannabis and Derivative Products and documentation that the mortgagor or lienholder has been given notice of the use of the property for the purposes of processing of low-THC cannabis and Derivative Products; and
        ii. For any property owned by the Applicant but subject to a mortgage or lien, include documentation that the mortgagor or lienholder has been notified of the use of the property for the purposes of processing of low-THC cannabis and Derivative Products.
    b. Compliance with local regulations regarding sanitation and waste disposal;
    c. The ability to obtain zoning approval;
    d. Sketch or other illustration approximating the property boundaries, land topography, vegetation, proposed and/or existing structures, easements, wells, and roadways for each processing property proposed;
    e. A description of the ability or plan to expand any of the areas proposed for processing low-THC cannabis;
    f. Back-up systems for all processing systems;
    g. Description of the areas proposed for the processing of Derivative Products, including the following:
        i. Extraction equipment and location;
        ii. Concentration equipment and location;
        iii. Access to sufficient potable water and hot water;
        iv. Analytical equipment, including separators and detectors, and location;
        v. Safety equipment and facilities and location;
        vi. Computer systems and software; and
        vii. Ventilation and exhaust system.
    h. A list of current and proposed staffing, including:
        i. Position, duties and responsibilities;
        ii. Resume; and
        iii. Professional licensure disciplinary action in all jurisdictions.
    i. An organizational chart illustrating the supervisory structure of the processing function of the proposed Dispensing Organization;
    j. Plans and procedures for loss of key personnel;
    k. Plans and procedures for complying with OSHA regulations for workplace

safety; and

l. Relationship(s) with an independent laboratory(ies) with cannabis testing protocols and methods.

4. Accountability (4.002(2)(d)) [25%]
    a. Floor plan of each facility or proposed floor plans for proposed processing facilities, including the following:
        i. Locking options for each means of ingress and egress;
        ii. Alarm systems;
        iii. Video surveillance;
        iv. Name and function of each room
        v. Layout and dimensions of each room.
    b. Storage, including the following:
        i. Safes;
        ii. Vaults; and
        iii. Climate control.
    c. Diversion and trafficking prevention procedures for the processing facilities;
    d. A facility emergency management plan for the processing facilities;
    e. System for tracking low-THC source plant material throughout processing;
    f. Inventory control system for low-THC cannabis and Derivative Products;
    g. Policies and procedures for recordkeeping;
    h. Vehicle tracking systems;
    i. Vehicle security systems;
    j. Methods of screening and monitoring employees;
    k. Personnel qualifications and experience with chain of custody or other tracking mechanisms;
    l. Personnel reserved solely for inventory control purposes;
    m. Personnel reserved solely for security purposes;
    n. Waste disposal plan; and
    o. Access to specialized resources or expertise regarding data collection, security, and tracking.

C. Dispensing (15%)

1. Technical Ability (4.002(2)(a)) [25%]
    a. Experience interacting with patients;
    b. Experience with handling confidential information;
    c. A marketing plan;
    d. Experience gathering and managing data, i.e. data on patient reactions to products dispensed;
    e. Experience with recalls;
    f. Knowledge of cannabis routes of administration;
    g. Training programs for employees addressing:
        i. The Health Insurance Portability and Accountability Act (HIPAA);
        ii. Patient education;
        iii. Compliance;
        iv. Patient counseling; and
        v. Data collection.
    h. Any awards, recognition or certifications received for relevant expertise.

2. Infrastructure (4.002(2)(e)) [25%]
    a. A map showing the location of the applicant's proposed dispensing facilities;
    b. A sketch or other illustration of the actual or proposed dispensing locations showing streets; property lines; buildings; parking areas; outdoor areas, if applicable; fences; security features; fire hydrants, if applicable; and access to water and sanitation systems;
    c. A floor plan of the actual or proposed building or buildings where dispensing activities will occur showing:
        i. Areas designed to protect patient privacy; and
        ii. Areas designed for retail sales.
    d. A HIPAA compliant computer network utilized by all facilities;
    e. Vehicles that will be used to transport product among cultivating, processing, and dispensing facilities;
    f. Communication systems;
    g. Hours of operation of each dispensing facility; and
    h. Methods of mitigating odors if applicable.
3. Premises, Resources, Personnel (4.002(2)(c)) [25%]
    a. Location of all properties Applicant proposes to utilize to dispense Derivative Products, including ownership information for the properties and any lease terms if applicable:
        i. For any property that is leased by the Applicant, include documentation that the property owner consents to the use of the property for the purposes of dispensing of Derivative Products and documentation that the mortgagor or lienholder has been given notice of the use of the property for the purposes of dispensing of Derivative Products; and
        ii. For any property owned by the Applicant but subject to a mortgage or lien, include documentation that the mortgagor or lienholder has been notified of the use of the property for the purposes of dispensing of Derivative Products.
    b. Compliance with local regulations regarding sanitation and waste disposal;
    c. The ability to obtain zoning approval;
    d. Sketch or other illustration approximating the dispensing property boundaries, land topography, vegetation, proposed and/or existing structures, easements, wells, and roadways for each property proposed;
    e. A description of the ability or plan to expand any of the areas proposed for dispensing Derivative Products;
    f. Description of the methods proposed for the dispensing of Derivative Products, including the following:
        i. Accessibility of dispensing facilities, e.g., centrally located to several populated areas, located on a main roadway, not in a high crime area, et cetera;
        ii. Proximity of dispensing facilities to patient populations; and
        iii. Alternative dispensing, e.g. delivery.
    g. A list of current and proposed dispensing staffing, including:
        i. Position, duties and responsibilities;
        ii. Resume; and

iii. Professional licensure disciplinary action in all jurisdictions.

h. An organizational chart illustrating the supervisory structure of the dispensing function of the proposed Dispensing Organization;
i. Plans and procedures for loss of key personnel; and
j. Plans and procedures for complying with OSHA regulations for workplace safety.

4. Accountability (4.002(2)(d)) [25%]
    a. Floor plan of each facility or proposed floor plans for proposed dispensing facilities, including the following:
        i. Locking options for each means of ingress and egress;
        ii. Alarm systems;
        iii. Video surveillance;
        iv. Name and function of each room; and
        v. Layout and dimensions of each room.
    b. Storage, including the following:
        i. Safes;
        ii. Vaults; and
        iii. Climate control.
    c. Diversion and trafficking prevention procedures for the dispensing facilities;
    d. A facility emergency management plan for the dispensing facilities;
    e. System for tracking Derivative Products throughout dispensing;
    f. Inventory control system for Derivative Products;
    g. Policies and procedures for recordkeeping;
    h. Vehicle tracking systems;
    i. Vehicle security systems;
    j. Methods of screening and monitoring employees;
    k. Personnel qualifications and experience with chain of custody or other tracking mechanisms;
    l. Personnel reserved solely for inventory control purposes;
    m. Personnel reserved solely for security purposes;
    n. Plans for the recall of any Derivative Products that have a reasonable probability of causing adverse health consequences based on a testing result, bad patient reaction, or other reason; and
    o. Access to specialized resources or expertise regarding data collection, security, and tracking.

D. Medical Director (5%)

a. Specialty area, if any;
b. Experience with epileptic patients;
c. Experience with cancer patients;
d. Experience with patients with severe seizures or muscle spasms;
e. Knowledge of the use of low-THC cannabis for treatment of cancer or physical medical conditions that chronically produce symptoms of seizures or severe and persistent muscle spasms;
f. Knowledge of good manufacturing practices;
g. Knowledge of analytical and organic chemistry;
h. Knowledge of analytical laboratory methods;

i. Knowledge of analytical laboratory quality control, including maintaining a chain of custody;
j. Knowledge of, and experience with, CBD/low-THC extraction techniques;
k. Knowledge of CBD/low-THC routes of administration;
l. Experience in or knowledge of clinical trials or observational studies;
m. Knowledge of, and experience with, producing CBD/low-THC products;
n. Experience with or knowledge of botanical medicines;
o. Experience with dispensing medications;
p. Description of how the medical director will supervise the activities of the Dispensing Organization; and
q. Description of how the Dispensing Organization will ensure it has a medical director at all times.

E. Financials (20%)

a. Certified Financials issued within the immediately preceding 12 months;
b. Applicant's corporate structure;
c. All owners of the Applicant;
d. All individuals and entities that can exercise control of the Applicant;
e. All individuals and entities that share in the profits and losses of the Applicant;
f. All subsidiaries of the Applicant;
g. Any other individuals or entities for which the Applicant is financially responsible;
h. Assets of the Applicant and Applicant's subsidiaries;
i. Liabilities of the Applicant and Applicant's subsidiaries;
j. Any pending lawsuits to which the Applicant is a party;
k. Any lawsuits within the past 7 years to which the Applicant was a party;
l. All financial obligations of Applicant that are not listed as a "liability" in the Certified Financials;
m. A projected two year budget for the Dispensing Organization; and
n. Specific reference to sufficient assets available to support the Dispensing Organization activities.

Part IV

The completed Application must be delivered to the Agency Clerk of the Department of Health physically located at 2585 Merchants Row Boulevard in Tallahassee, Florida, 32399, no earlier than 10:00 AM, Eastern Daylight Time, on the (effective date) and no later than 5:00 PM, Eastern Daylight Time, 21 calendar days after (effective date). The Application MUST include:

1. **A non-refundable $60,063 application fee in the form of a money order or cashier's check made payable to the Florida Department of Health;**
2. **All supporting explanations and documents;**
3. **Any supporting maps, photographs, or illustrations;**
4. **A list of ALL supporting materials for which the Applicant claims ANY public records exemption, including a specific legal citation to the exemption; and**
5. **A full proposed redacted version of the Application, if applicable.**

The completed Application with and supporting explanations, documents, maps, photographs, or illustrations can be submitted in the following formats:

1. **Hard Copy;**
2. **USB Drive; and**
3. **CD/DVD.**

The undersigned Applicant /Representative hereby agrees to operate the Dispensing Organization described in this application in accordance with the requirements of Section 381.986, Florida Statutes, and Chapter 64-4, F.A.C. The information contained in this application and the attached exhibits required by Chapter 64-4, F.A.C., which serves as a basis for licensure, is true and correct. I
understand that any misrepresentation of the facts in this application, or failure to comply with requirements of the rules and statutes, is grounds for denial or revocation of the Low-THC Cannabis Dispensing Organization Approval. I understand that knowingly making a false statement in writing with the intent to mislead a public servant in the performance of his or her official duty shall be guilty of a misdemeanor of the second degree punishable as provided in sections 775.082 or 775.083, Florida Statutes.

Signature of Applicant _____ Date 7/7/2015

Name of Applicant (print or type) _____

Agency Clerk Use Only
Date and Time Received: _____
Delivered by: _____
Agency Clerk: _____

The completed Application with and supporting explanations, documents, maps, photographs, or illustrations can be submitted in the following formats:

1. **Hard Copy;**
2. **USB Drive; and**
3. **CD/DVD.**

The undersigned Applicant /Representative hereby agrees to operate the Dispensing Organization described in this application in accordance with the requirements of Section 381.986, Florida Statutes, and Chapter 64-4, F.A.C. The information contained in this application and the attached exhibits required by Chapter 64-4, F.A.C., which serves as a basis for licensure, is true and correct. I
understand that any misrepresentation of the facts in this application, or failure to comply with requirements of the rules and statutes, is grounds for denial or revocation of the Low-THC Cannabis Dispensing Organization Approval. I understand that knowingly making a false statement in writing with the intent to mislead a public servant in the performance of his or her official duty shall be guilty of a misdemeanor of the second degree punishable as provided in sections 775.082 or 775.083, Florida Statutes.

Signature of Applicant _____ Date 7/7/2015

Name of Applicant (print or type) Robert D. Wallace

Agency Clerk Use Only
Date and Time Received: _____
Delivered by: _____
Agency Clerk: _____

PART II - CERTIFICATION AND BACKGROUND CHECKS

Part II A. Documentation sufficient to establish the Applicant meets the requirements

1. Certification by the Florida Department of Agriculture and Consumer Services for the cultivation of more than 400,000 plants; and
2. Operation as a nursery in this state for at least 30 continuous years.

Chestnut Hill Tree Farm, LLC meets all requirements for an Applicant to receive approval to operate a Low-THC Dispensing Organization. Please see the attached documentation including the nursery's certification and the list published by the Department of Agriculture and Consumer Services based on the department's best available records and prepared in response to media inquiries and public records requests dated June 19, 2015.

B57763

Florida Department of Agriculture and Consumer Services

CERTIFICATE OF NURSERY REGISTRATION

Section 581.131, F.S. and Rule 5B-2.002, F.A.C
1911 S.W. 34th St. P.O. Box 147100, Gainesville, FL 32614-7100 (352) 395-4700

ADAM H PUTNAM
COMMISSIONER

COPY

ISSUED TO:

CHESTNUT HILL TREE FARM, LLC
WALLACE, ROBERT D.
15105 NW 94TH AVE
ALACHUA, FL 32615-6709

THIS CERTIFICATE EXPIRES: 11/30/2015

FEE PAID: $460.00

REGISTRATION NO.: 04717324

DATE ISSUED: 09/12/2014

THIS IS TO CERTIFY that the nursery stock on the premises of the nursery shown hereon has been inspected for plant pests and meets at least the minimum requirements of Section 581.131, Florida Statutes.

THIS CERTIFICATE OF REGISTRATION MUST BE DISPLAYED or in the immediate possession of any person engaged in the sale or distribution of nursery stock.

ADAM H PUTNAM
Commissioner of Agriculture

FDACS-08002 Revised 05/05

The following information is based on the department's best available records and was prepared in response to media inquiries and public records requests. The inclusion of a nursery on this list is **NOT** a determination of eligibility for licensure as a medical marijuana dispensary pursuant to Section 381.986, Florida Statutes. Revised 6-19-15

NURSERY #	NURSERY NAME	ADDRESS	TOTAL INVENTORY	REGISTRATION DATE
04720397	AGRI-STARTS, INC.	1728 W KELLY PARK RD APOPKA	3,058,600	5/1/1985
04722053	ALBRITTON'S NURSERY	4151 PROCTOR RD SARASOTA	408,490	1984 Nursery Directory
04719077	ALPHA FOLIAGE	18455 SW 264TH ST HOMESTEAD	4,789,906	9/13/1983
4719425	AMPLEX	13100 34 ST N CLEARWATER	420,000	3/6/1984
04718833	ANGLO SCANDINAVIAN GREENHOUSES, INC.	680 MARSHALL LAKE RD APOPKA	445,000	6/16/1983
04142000	ARIS HORTICULTURE, INC.	2201 OWANITA RD ALVA	800,000	1984 Nursery Directory
00226000	BAYWOOD NURSERIES CO., INC.	PO BOX 24 PLYMOUTH	502,554	1984 Nursery Directory
04719110	BOTANICS WHOLESALE, INC.	31701 SW 194 AVE HOMESTEAD	487,466	1984 Nursery Directory
04715274	BOYD NURSERIES, INC.	1535 B RD LOXAHATCHEE	640,720	1/25/1980
04720060	BRANTLEY NURSERIES	1931 W LAKE BRANTLEY RD LONGWOOD	1,678,000	1/15/1985
00431000	BROUWER'S FLOWERS	P O BOX 303 TERRA CEIA	400,100	1984 Nursery Directory
02033050	BULLIS BROMELIADS	12420 SW 248TH ST PRINCETON	441,420	9/16/1975
00501000	BUTLER'S FOLIAGE, INC.	P O BOX 924297 PRINCETON	760,500	1984 Nursery Directory
00563050	CARROLL BROTHERS NURSERY, INC.	4950 38TH AVE N SAINT PETERSBURG	710,119	12/8/1975
04720918	CENTRAL FLORIDA LANDS & TIMBER NURSERY,	3087 N COUNTY ROAD 53 MAYO	5,136,000	9/18/1985
04721205	CHERRY LAKE TREE FARM	7836 CHERRY LAKE RD GROVELAND	3,107,918	12/16/1985
04717324	CHESTNUT HILL TREE FARM, LLC	15105 NW 94TH AVE ALACHUA	406,337	11/23/1981
03366010	CLINTON NURSERIES OF FLORIDA	PO BOX 997 HAVANA	1,502,000	1984 Nursery Directory
00735000	COSTA FARMS, LLC	22290 SW 162 AVE GOULDS	22,664,134	1984 Nursery Directory
04714580	COUNTRY JOE'S NURSERY, INC.	PO BOX 541265 GREENACRES	415,100	7/19/1979
04715860	DELEON'S BROMELIADS, INC.	13745 SW 216 ST GOULDS	2,857,340	7/3/1980
00874000	DELRAY PLANTS CO.	956 OLD STATE ROAD 8 VENUS	2,576,776	10/11/1976
00893000	DEWAR NURSERIES, INC.	625 W KEENE RD APOPKA	2,916,585	2/8/1964
04712460	ED MILLER & SON	PO BOX 837 STUART	423,863	10/23/1970
04711821	EVE'S GARDEN, INC.	5602 LAND O LAKES BLVD LAND O LAKES	402,370	12/1/1977
47231895	FLORAL ACRES, LLC	PO BOX 480519 DELRAY BEACH	769,008	1984 Nursery Directory
01162000	FLORIDA AQUATIC NURSERY, INC.	700 S FLAMINGO RD DAVIE	650,030	8/12/1965
04716868	FLORIDA TUXEDO PLANTS, INC.	11300 SW 125TH ST MIAMI	431,000	6/3/1981
04720878	FLOWERWOOD NURSERY, INC.	2792 CR 564 BUSHNELL	500,000	9/6/1985
01324000	GATEWAY GARDENS	850 FLORIDA AVE OVIEDO	425,000	3/2/1964
01327000	GATOR GROWERS NURSERY	PO BOX 507 PLYMOUTH	500,752	2/28/1967
03249010	GRANDIFLORA	7315 NW 126TH ST GAINESVILLE	561,200	10/23/1973
4717767	GREEN IMAGES	1333 TAYLOR CREEK RD CHRISTMAS	405,000	4/21/1982
01446150	GREEN LEAF NURSERY, INC.	19355 SW 304 ST HOMESTEAD	440,000	10/24/1973
04718391	GREEN SEASONS NURSERY	P O BOX 539 PARRISH	500,000	1984 Nursery Directory
04719997	GREENER PATH NURSERY	PO BOX 1769 SEFFNER	403,494	12/18/1984
04716874	HACKNEY NURSERY	PO BOX 160 GREENSBORO	1,802,000	6/2/1981
04711659	HAPPY PLANTS	PO BOX 1814 MOUNT DORA	801,381	6/24/1977
01585000	HARRELL'S NURSERY, INC.	3315 ENGLISH RD PLANT CITY	858,800	11/5/1964
04170099	HART'S PLANT NURSERY	1404 BLAIR RD JACKSONVILLE	466,888	1984 Nursery Directory
04720199	HATCHETT CREEK FARMS	11713 NE STATE ROAD 26 GAINESVILLE	600,000	3/1/1985
01047000	HERMANN ENGELMANN GREENHOUSES	PO BOX 1147 APOPKA	1,387,200	5/1/1962
04717863	HIMROD CITRUS NURSERY	3688 HIMROD RD BOWLING GREEN	491,876	1984 Nursery Directory
4715228	HOMRICH NURSERY	9901 US HIGHWAY 441 BOYNTON BEACH	428,485	1/8/1980
03702010	J. D. THORNTON NURSERIES, INC.	1010 E US HIGHWAY 27 CLEWISTON	2,009,583	4/27/1978
02591400	JERRY'S GARDENIAS	6336 MOUNT PLYMOUTH RD APOPKA	600,000	9/22/1983
01950000	JON'S NURSERY, INC.	24546 NURSERY WAY EUSTIS	12,865,180	12/27/1971
04719026	KEITH ST. GERMAIN NURSERY	16990 SW 266TH TER HOMESTEAD	1,906,000	8/16/1983
02031020	KERRY'S NURSERY, INC.	21840 SW 258 ST HOMESTEAD	1,636,000	8/28/1975
04711494	KITCHEN GARDENS	250 SABAL PALM RD NAPLES	435,210	10/19/1977
02086000	KNOX NURSERY, INC.	940 AVALON RD WINTER GARDEN	1,202,000	10/22/1963
02093000	KRAFT GARDENS, INC.	1555 N KINGS HWY FORT PIERCE	843,612	1984 Nursery Directory
02280000	LOOP'S NURSERY & GREENHOUSES, INC.	2568 OLD MIDDLEBURG RD JACKSONVILLE	951,781	5/1/1963
02406000	MANATEE FLORAL, INC.	PO BOX 128 PALMETTO	430,810	6/30/1962
00898000	MANUEL DIAZ FARMS, INC.	26401 SW 107TH AVE HOMESTEAD	641,029	12/4/1973
02476000	MAY NURSERY, INC.	178 MAY NURSERY RD HAVANA	2,900,500	1984 Nursery Directory
04716063	MCCRORY'S SUNNY HILL NURSERY	35152 LA PL CT EUSTIS	610,005	9/3/1980
02500010	MEYER'S NURSERIES, INC.	9491 ROCKHILL RD THONOTOSASSA	432,774	5/9/1963
02600000	MULVEHILL NURSERY, INC.	9821 HAPPY HOLLOW RD DELRAY BEACH	550,679	5/18/1976
04718185	NATURE'S WAY NURSERY OF MIAMI, INC.	PO BOX 971129 MIAMI	1,543,888	10/19/1982
02648000	NELSON'S WHOLESALE NURSERY, INC.	4850 BERRY RD GRANT	435,038	5/16/1962
02652000	O. F. NELSON & SONS NURSERY, INC.	3207 CLARCONA RD APOPKA	478,000	5/7/1963
04719598	OGLESBY PLANTS INTERNATIONAL, INC.	15168 NW OGLESBY RD ALTHA	4,382,968	1984 Nursery Directory
04718084	ORNAMENTAL PLANTS & TREES	137 SUNNYSIDE DR HAWTHORNE	629,122	9/14/1982
04711437	PECKETT'S, INC.	5643 ROUND LAKE RD APOPKA	1,050,022	10/12/1977
04717449	PENANG NURSERY, INC.	PO BOX 1658 APOPKA	1,090,000	1/25/1982
04710534	PERKINS NURSERY, INC.	PO BOX 2460 LABELLE	539,012	4/4/1977
04720945	PHOENIX FOLIAGE	1751 WILLIAMS RD WINTER GARDEN	1,426,800	9/27/1985
02934000	PINE ISLAND NURSERY, INC.	16300 SW 184 ST MIAMI	464,290	3/6/1972
04712303	PLANTS IN DESIGN	20905 SW 162ND AVE MIAMI	1,886,000	3/23/1978
02954050	PLANTS INC. OF SARASOTA	13111 FRUITVILLE RD SARASOTA	622,122	9/10/1976
04715664	PLANTS OF RUSKIN, INC.	901 4TH ST NW RUSKIN	640,231	4/22/1980
03655010	RALPH TAYLOR'S NURSERIES	4973 LORRAINE RD BRADENTON	665,000	10/1/1963
04719555	RASNAKE CITRUS NURSERY	50 N LAKE IDYLWILD DR WINTER HAVEN	522,500	4/30/1981
03064010	RAZBUTON, INC.	PO BOX 783006 WINTER GARDEN	410,000	9/20/1976
03074000	REDLAND NURSERY	18455 SW 264TH ST HOMESTEAD	3,172,469	12/2/1971
04718331	RIVERVIEW FLOWER FARM, INC.	9107 TAYLOR RD SEFFNER	1,269,000	12/6/1982
03151000	ROBERT'S NURSERY, INC.	PO BOX 38 SEFFNER	430,000	5/1/1963
04720312	ROSE OF SHARON NURSERY, INC.	18470 SW 206TH ST MIAMI	515,000	3/28/1985
03408010	SIMPSON NURSERIES	PO BOX 160 MONTICELLO	2,606,000	1984 Nursery Directory
03483000	SOUTHERN CITRUS NURSERIES, LLC	PO BOX 970 DUNDEE	1,136,648	5/1/1963
03492200	SPEEDLING, INC.	PO BOX 7220 SUN CITY	2,700,000	1984 Nursery Directory
04714156	SPRING OAKS GREENHOUSE, INC.	17323 LAKE ST UMATILLA	536,600	2/5/1979
03235100	ST. GERMAIN'S DRACAENA FARM	27600 SW 197TH AVE HOMESTEAD	400,705	11/13/1975
03585000	SUN BULB CO., INC.	P O DRAWER 698 ARCADIA	1,184,966	3/2/1964
04721014	SUNDANCE GROWERS	PO BOX 7357 SUN CITY	827,000	10/14/1985
00007000	SUNSHINE FOLIAGE WORLD	2060 STEVE ROBERTS SPECIAL ZOLFO SPRINGS	611,005	4/30/1973
03621000	SUWANNEE LABORATORIES, INC.	PO BOX 1823 LAKE CITY	411,477	1984 Nursery Directory
03646000	TAMPA WHOLESALE NURSERY, INC.	3216 MCINTOSH RD DOVER	404,000	4/1/1964
04170088	THE GREEN MACHINE, INC.	PO BOX 783036 WINTER GARDEN	410,000	2/4/1977
04717220	TORNELLO LANDSCAPE CORP.	PO BOX 789 RUSKIN	403,787	10/12/1981
04717696	TRANS GRO	3315 STATE ROAD 29 S IMMOKALEE	166,008,775	4/20/1982
04719893	TRANSPLANT GROWERS, INC.	PO BOX 1508 SORRENTO	1,542,525	10/31/1984
03756020	TREADWELL NURSERY	PO BOX 194 SORRENTO	618,207	7/18/1974
04716782	TREE-KING TREE FARM, INC.	4903 SR 54 NEW PORT RICHEY	2,775,288	1984 Nursery Directory
03785050	TROPIFLORA	3530 TALLEVAST RD SARASOTA	586,000	1/6/1976
03857000	VAUGHAN, INC.	107 W COMMERCIAL ST SANFORD	456,000	1984 Nursery Directory
01468010	W. E. GREEN & SONS CITRUS NURSERY, INC.	PO BOX 202 DUNDEE	975,000	5/27/1963
03934000	WARD'S NURSERY, INC.	PO BOX 850 AVON PARK	532,507	5/1/1963
04030000	WHITE SAND NURSERY GROUP	PO BOX 968 PLYMOUTH	1,373,765	7/1/1963
04096040	WINDMILL FARMS NURSERIES, INC.	4687 S HAMMOCK RD ZOLFO SPRINGS	760,000	7/15/1975
04718241	WYLD WEST ANNUALS, INC.	P O BOX 1145 LOXAHATCHEE	552,186	11/4/1982

Jill Lamoureux <jillklamoureux@gmail.com>

Fwd: Confirmation from DPI of Qualification

2 messages

chnuts@gmail.com <chnuts@gmail.com> Mon, Jun 15, 2015 at 2:24 PM
To: Jill Lamoureux <jillklamoureux@gmail.com>

Sent from my iPhone

Begin forwarded message:

From: "Emery, Tyson" <Tyson.Emery@freshfromflorida.com>
Date: June 15, 2015 at 12:43:42 PM PDT
To: 'Robert Wallace' <chnuts@gmail.com>
Subject: RE: Confirmation from DPI of Qualification

No need, we will certify a list of all registered nurseries that meet the statutory registration requirements for the compassionate cannabis permits from DOH. The list includes Chestnut Hill Nursery.

At this time I don't anticipate any additional information will be needed from us, but if so we would be able to assist.

Tyson Emery

Chief- Bureau of Plant and Apiary Inspection

Division of Plant Industry

Florida Department of Agriculture and Consumer Services

(352) 395-4709

Tyson.Emery@FreshFromFlorida.com

PO Box 147100

Gainesville, FL 32614-7100

www.FreshFromFlorida.com

Please note that Florida has a broad public records law (Chapter 119, Florida Statutes).

Most written communications to or from state employees are public records obtainable

Part II B. Please submit a list of all owners and managers indicating the date of each individual's most recent level-2 background screening.

Chestnut Hill Tree Farm, LLC has caused several individuals to be receive level-2 background screenings for the purpose of the application. Robert D. Wallace and Deborah Gaw are currently, and will remain, the only two owners and members of the Applicant. The managers listed below will have positions of control in the Dispensing Organization; however, they are not owners or managing members of the Limited Liability Company.

OWNERS	**Position**	**Date**
Robert D. Wallace	CEO	Submitted 6.19.15
Deborah A. Gaw	CFO	Submitted 6.22.15
MANAGERS		
Susan Baumgartner	COO	Submitted 6.19.15
Heather Blake	Office Manager	Submitted 6.19.15
Codi Coleman	Cultivation Director	Submitted 6.19.15
Thomas McGinity	Outreach Manager	Submitted 6.19.15
Dr. Richard Tempel	Medical Director	Submitted 6.15.15
R. Dunstan Wallace	Inventory Manager	To be completed.*
		*Out of the country.
CONTRACT CONSULTANTS		
Kris Palmer	Consultant	Submitted 6.19.15
Samuel Glucksman	Consultant	Submitted 6.19.15
Brady Blake	Consultant	Submitted 6.19.15

Part II B. Please submit a list of all owners and managers indicating the date of each individual's most recent level-2 background screening.

EXECUTIVE SUMMARY

Chestnut Hill Tree Farm is submitting this application for approval to be an authorized dispensing organization that will provide low-THC medical cannabis to patients in need throughout the State of Florida. Chestnut Hill, and its pharmaceutical division Novia Medical, is well positioned to be one of the five dispensary organizations of low-THC medical cannabis in the State of Florida. We are committed to building an organization that will provide high-quality medical cannabis products, ensure an unwavering commitment to patients and their health outcomes, and facilitate the expansion and transfer of knowledge related to medical cannabis.

We have put in place the financial resources, human capital, and operating plans to ensure the accessibility and availability of low-THC cannabis to patients. We will distinguish our company and our operations by the high quality standards that we uphold, differentiated product offerings that directly address patient and medical needs, philosophy of putting patients first, and our commitment to research and education. We will create validated pharmaceutical delivery systems for these important therapeutic agents to ensure that true medical products with reliable exposure to known active compounds are available to physicians for improved therapeutic outcomes and responsibly put in the hands of patients to do the most good. Chestnut Hill and Novia Medical look forward to working collaboratively with the State of Florida and the Florida Department of Health Office of Compassionate Use to address the needs of the patients who we will serve and contribute positively to the experience of all stakeholders with respect to the introduction of medical cannabis to Florida.

Chestnut Hill Tree Farm has a unique history and a distinguished track record of success in the nursery business which set the foundation for a successful medical cannabis business. Founded in 1981, Chestnut Hill Tree Farm in Alachua is a qualified nursery with over 34 years of experience, growing more than 400,000 plants annually in the Northeast Region of Florida and introducing new plant varieties to American horticulture, orchards, and forests. Chestnut Hill Tree Farm has extensive propagation and cultivation experience across a wide diversity of plant species and grows over 100 varieties of trees, fruit, berries, herbaceous plants, and shrubs, many of which are not native to Florida. Chestnut Hill Tree Farm has diverse experience with non-native and edible plants, including chestnuts and Oriental persimmons. Chestnut Hill Tree Farm brings a history of innovation as a breeder, developer, and marketer of new edible nut and fruit varieties.

Chestnut Hill Tree Farm has led the development of the chestnut industry in the United States with patents and innovative products, including the introduction of a new variety of chestnut tree, the Dunstan Chestnut™, Chestnut Magic™, and food products sold to Whole Foods Market. Robert Wallace, the founder of the Chestnut Growers of America and CEO of Chestnut Hill Tree Farm, has been a trailblazer in the establishment of chestnuts as a new commercial orchard crop in America. Wallace's grandfather, noted plant breeder Dr. Robert T. Dunstan, bred the Dunstan Chestnut ™, a hybrid of American and Chinese chestnuts that are blight resistant. Wallace, the proud son of Dr. A.T. Wallace (former Dean for Research at the University of Florida College of Agriculture), learned critical agricultural techniques and gained extensive experience in cultivation early in life from both his father and grandfather. The company's relationship with the University of Florida has been strong over the past three decades. Chestnut Hill Tree Farm grows and markets a number of fruit varieties patented by University of Florida breeders and pays sales royalties to the University of Florida Research Foundation. The CEO and key team members will utilize their experience, relationships, and expertise to successfully cultivate medical cannabis and establish the company as a leader in the medical cannabis industry as it has done in the chestnut industry in the United States. Chestnut Hill and Novia Medical will build on the foundation of success established by Chestnut Hill Tree Farm to reliably deliver high-quality and innovative medical cannabis products to patients in need.

Chestnut Hill and Novia Medical are committed, first and foremost, to exceeding the highest quality standards for the products that we will deliver to patients, our operations, and the services

that we provide. We will be guided by the acknowledgement that our products are for use by patients, including children, to alleviate their suffering, manage their disease, and restore their health. Our dedication to the quality, purity, and safety of our medical cannabis products will be evident throughout our operating plans that are documented within this application, our policies and procedures, and the industry-leading best practices to which we will adhere in every aspect of our business planning and execution. Our comprehensive quality management system will ensure that the highest quality standards are met from seed to sale and will be a distinguishing feature of our company that will enable reliable delivery of high quality products for patients. We will partner this quality system with an integrated data management system called BioTrackTHC for documentation, reporting, and oversight of operations, performance, and quality.

Chestnut Hill and Novia Medical will introduce a revolutionary new approach to medical cannabis delivery and offer differentiated medical products that directly address patient and medical needs. We will create validated pharmaceutical delivery systems for these important therapeutic agents to ensure that true medical products with reliable exposure to known active compounds are available to physicians for improved therapeutic outcomes and responsibly put in the hands of patients to do the most good. Novia Medical has established partnerships with industry leaders in pharmaceutical formulation development, drug delivery systems, and manufacturing to develop true medical products that optimize delivery of active compounds derived from medical cannabis. A controlled-release formulation of cannabis oil delivered in a capsule-based dosage form will be developed and marketed by Novia Medical in collaboration with experts in pharmaceutical development. This will allow reliable and predictable delivery of prescribed dosages to patients over time. This platform, along with our unparalleled quality procedures and standards, will offer the flexibility to produce and objectively evaluate defined quantities and ratios of cannabinoids. Our unique medical delivery platforms will also ensure that clinical exposure to active ingredients in the cannabis plant is optimal for specific disease states, symptoms, and patients, enabling the realization of personalized and precision medicine.

We have engaged strategic partners, employees, and advisors with leadership positions in the pharmaceutical industry and relevant expertise in pharmaceutical sciences and drug development. These individuals will provide guidance and oversight regarding the development and use of these true medical products derived from medical cannabis. They will also facilitate access to their research networks at leading institutions for basic, clinical, and translational research that supports medical cannabis and accelerates future development and regulatory approval of medical products as needed. Novia Medical has also partnered with Josh Stanley, the founder of the Charlotte's Web strain, to introduce new strains and conduct future evaluations of new treatments for a variety of illnesses, including several kinds of cancer. Product innovation that improves patient outcomes will be a driving force for Novia Medical. We will remain committed to product development and enhancements based on patient feedback, data analysis, and scientific and clinical evidence.

Most importantly, patients will remain the focus of our business and operations. Novia Medical is committed to education and research related to medical cannabis and will invest significant company resources in these meaningful endeavors. The medical education plans that are outlined in this application address the target audiences of patients, physicians, and the community to enhance knowledge of medical cannabis and enable expanded and appropriate use of medical cannabis products for the good of patients and public health. Novia Medical will invest in product design and development strategies and tactics that are informed by scientific evidence and real-world clinical experience with medical cannabis products.

Chestnut Hill and Novia Medical are dedicated to supporting scientific and clinical research that aligns with the mission of the company, expands current knowledge regarding medical cannabis and its clinical applications, and enables the expanded use of medical cannabis in appropriate patients for unmet medical needs. Novia Medical will allocate 2.5% of its gross sales in perpetuity for external research funding related to medical cannabis. This funding will be granted primarily to academic research institutions, medical centers, and clinical researchers in Florida, including

the University of Florida and UF Health in Gainesville, in compliance with all applicable regulations and requirements. Novia Medical will support and encourage independent research in these areas and will also allocate company funding for significant research and development efforts to advance Novia Medical products, develop the next generation of medical cannabis products, and support the evidence-based use of these important therapeutic agents. With the University of Florida in close proximity to the facilities of Novia Medical, the company is positioned well to support the University of Florida College of Pharmacy in its efforts to conduct research on the safety and efficacy of low-THC cannabis in patients based on patient treatment plan data that are submitted quarterly.

It is our intent that funding medical cannabis research will expand understanding of these new therapeutic agents, further the development of effective treatments for a wide range of disease states, and enable better patient outcomes. We look forward to working with the Florida Department of Health Office of Compassionate Use to enhance access to investigational products for Florida patients through approved clinical treatment plans or studies. In the future, Chestnut Hill and Novia Medical anticipate research collaborations with Colleges of Agriculture, Pharmacy, and Medicine at academic research centers throughout the State of Florida. Novia Medical will also establish a non-profit organization to fund and conduct important research related to medical cannabis independent of research institutions and potentially involving researchers at these institutions who may have concerns about studying these controlled substances prior to regulatory clearances at the federal level. It is our intent to support and facilitate research and create research collaborations that help establish the State of Florida, University of Florida, UF Health, and Novia Medical as leaders in the rapidly emerging science of medical cannabis.

None of this could be accomplished without a team of talented individuals and advisors who will bring these plans to life and dedicate themselves to the mission of Novia Medical. We have the right plan and also the best team to make a difference in patients' lives and in the evolution of this industry. Novia Medical has put together a unique team with the combination of skills necessary to be able to grow, manufacture, and dispense novel medical cannabis products with a revolutionary approach to product formulation and delivery that address unmet medical needs.

The unparalleled strength, experience, and expertise of our team have been documented throughout the application. The following summary highlights what our key employs bring to the table that will drive the success of our organization:

- Team of experts in cultivation from Colorado and California
- Executive team members and strategic partners with decades of experience leading top-tier pharmaceutical companies and new product development
- Leading medical and industry consultants from Colorado who are recognized thought leaders with relevant experience across all aspects of medical cannabis operations
- Medical Director with diverse experience from practice in Emergency Medicine, significant interactions with a wide range of patient types, and expertise in peer-to-peer medical education
- Experienced security director and leading security systems provider in Florida
- Leading advisors for laboratory analysis and extraction
- Financial backing that will allow growth to attain these goals
- Experts in construction of state-of-the-art greenhouses and production facilities
- Long-standing ties across numerous employees and advisors with the University of Florida for collaborative research
- Partnership with Josh Stanley, the founder of the Charlotte's Web strain, who has significant knowledge and know-how regarding medical cannabis and related operations
- Strategic partnerships with experts in pharmaceutical formulation development and drug delivery

We believe that the combination of the unique approach proposed by Chestnut Hill and Novia Medical and our experienced team will allow us to attain our vision of providing high-quality medical cannabis products with reliable and predictable exposure to active compounds that will lay the groundwork for the effective and safe treatment of a diverse set of conditions and the advancement of the medical science of cannabis for patients of Florida and throughout the nation.

PART 3.A. CULTIVATION

Robert Wallace founded Chestnut Hill Tree Farm in 1981 in Alachua County, Florida. The operation has been family run since its inception. Because the owners have never cultivated cannabis and wish to retain 100% of their business, they sought out some of the industry's best advisors to help them learn to operate and succeed in the current environment while leveraging their experience and passion to establish a true pharmaceutical-based cannabis production enterprise in the near-term. The experience these advisors bring in best practice paired with the Applicant's knowledge of horticulture in Florida ensures the company is well-equipped to not only meet the regulatory 210 day deadline for distribution, but also to contribute to the long-term development of Florida's entire dispensing model. Chestnut Hill Tree Farm, LLC plans to collect data from patients to guide its research and development priorities for the Novia Medical brand. However, even with a team of leading of scientists, researchers, and professionals advancing in the company's product development future, the keys to production stability and affordable products begin in cultivation.

1. TECHNICAL ABILITY

Part 3.A.1.a. Experience cultivating cannabis

BRADY BLAKE - CONSULTANT

Brady Blake began working in the medical cannabis industry upon moving to Colorado in the late fall of 2009. His degree in business administration from the University of Central Florida, extensive management and customer service training, and security background helped him transition well into the industry. Blake began his horticulture career at Colorado Alternative Medicine in 2010. CAM is a highly recognized medical cannabis center known for their industry leading focus on having quality product for their patients. Starting in the product-processing department, he quickly advanced and was promoted into a quality control managerial position within three months. This position required the oversight of operational procedures, inventory control, and packaging and labeling departments. Blake commonly managed fifteen employees, ensuring each company staff member utilized best practices and compliance to good agriculture practices, company polices, and procedures.

As a quality control manager at Colorado Alternative Medicine, Blake gained extensive experience implementing and operating Colorado's State mandated tracking software system, Marijuana Inventory Tracking System, which efficiently tracks each crop from seed-to-sale. He believes his experience using the company's prior point-of-sale inventory software program, MMJ Freeway, provided a smooth transition to the use of a more advanced and efficient technology base. In 2013, Blake was promoted to a senior management position. After acquiring a Key Employee badge through the state of Colorado, Brady shifted his focus to the production side of the business. While maintaining his current duties, he was now responsible for the care of over 4,000 plants and approximately twenty new employees in a grow facility housing 240,000 watts of flower production. As the end of 2013 approached, Blake began consulting for two cannabis retail facilities aiding in compliance and application matters for approval of an adult use license in Colorado. Blake's technical abilities and know-how in the industry helped the two businesses obtain permits for recreational sales. Since then, Blake was promoted to a facility manager at CAM.

Blake's pervasive knowledge regarding the cultivation of cannabis and the crop's medicinal properties enables him to be a valuable asset to the company's business model and future patients. He has personally worked with and cultivated over one hundred strains of cannabis for human consumption, and has a deep understanding of each strain's particular medicinal benefits and relief of ailments. His continual research in the production process of cannabis has provided the benefit of witnessing the powerful healing cannabis provides to individuals. Blake's past experience with soft skills training, combined with his naturally compassionate attitude, help him remain focused on

the patients and their needs. Blake is driven to educate the public on the medicinal therapies cannabis provides and produce high-grade, quality medicine.

CODI COLEMAN – CULTIVATION DIRECTOR

Codi Coleman will hold the title of Cultivation Director for the company. A seasoned producer and consultant in the agriculture industry, he has extensive experience in both the economic and cultivation sides of the cannabis business. His career as a cannabis cultivator started in 2009; where various skilled experts in the field proficiently trained him to develop and manage large-scale cultivation operations. In 2012, he founded his own cultivation operations, directing all operational procedures and managing patient care. Recently, he opened a garden consulting firm.

Codi is highly knowledgeable in many types of nutrient additives and successful methodology applications, which have resulted in consistently healthy, successful yields. He generally prefers to use only organically derived nutrients and has expertise in safe agricultural practices. He has applied multiple training techniques to his operational protocols including: topping, super-cropping, trellising, and low stress training. In addition, Codi has created supplemental lighting climate controls designed to be amended for specific strains of cannabis for the production of offseason crops. Codi applies tracking and labeling methods to each crop from seed-to-sale. He is passionate about the medicinal healing cannabis provides to his patients, and has developed diligent operational procedures which provide pure, high-quality products.

JILL LAMOUREUX - ADVISOR

Chestnut Hill Tree Farm engaged the assistance of Jill Lamoureux to explore operating options and select an operating model that works best for the company. Lamoureux brings over eight years of commercial cultivation experience to the operating plan's development. She previously owned and operated some of the nation's first licensed cannabis facilities in Colorado. Her cultivation operations covered 50,000 sq. ft. in three locations and consistently provided pesticide free cannabis medicine for thousands of patients.

Lamoureux's hands on experience led her to be selected as a subject matter expert to BOTEC Analysis Corporation. Working with several RAND researchers in this role, she has been able to study cannabis production factors with some of the nation's leading economists giving her unique insight to the process. She advised the City of North Las Vegas on the required production square footage required to meet patient demand in the State of Nevada, helping them eliminate an arbitrary state cap on licenses. Most recently Lamoureux and the BOTEC team were selected to advise Jamaica's cannabis licensing authority on its creation of a regulatory model.

Lamoureux is also nationally known as an expert on cultivation best practice having chaired the American Herbal Products Association cannabis committee during its creation of recommendations to regulators for cannabis health and safety standards. She also developed and currently serves as Chairman of the Americans for Safe Access - Patient Focused Certification program. The program that is based on NSF standards provides audit protocols for cannabis cultivation, processing, manufacturing, and dispensing operations to ensure safe medicine for patients.

JAHAN MARCU, PHD - ADVISOR

Jahan Marcu shall assist the company in both quality assurance and scientific analytics. Jahan Marcu, Ph.D., is a cannabinoid research scientist, with expansive experience in quality assurance and groundbreaking research in the plant science and medicinal cannabinoid field. Dr. Marcu brings strategic focus, vision, and mature judgment gained during a successful career guiding the creation of operational protocols while implementing scientific research and advisory services that generate sustained, consistent, positive results to the cannabis industry. He uses innovation and research to educate the world, devise medications and develop fundamental business practices that change

patient's way of life for the better. Dr. Marcu is currently the Director of Research and Development at Green Standard Diagnostics Inc., the Senior Scientist at Americans for Safe Access (ASA), and on the Board of Directors of the International Association for Cannabinoids as Medicine (IACM). Jahan Marcu is also a founder of the Patient Focused Certification (PFC) program. He received his Ph.D. for significant contributions to the study of the structure and function of the CB1 receptor, and the role of the endocannabinoid system in bone.

Dr. Marcu's understanding and long-term involvement in the scientific field enables him to leverage diverse business optimization and research enhancements to a variety of entrepreneurial, market development businesses in the cannabis industry. Dr. Marcu's years of progressive experience have qualified him to significantly impact profitability and growth objectives for businesses in the cannabis field. Before earning his Ph.D., Dr. Marcu worked at the California Pacific Medical Center Research Institute studying the anti-cancer properties of compounds from the cannabis plant (Published in the Journal of Molecular Cancer Therapeutics) and on analytical cannabis research projects in Holland. Among many of his publications for cannabis research, he is also an author of the American Herbal Pharmacopeia's Cannabis Monograph and is the Chief Auditor for the PFC program. Dr. Marcu was the first recipient of the Billy Martin Research Award from the International Cannabinoid Research Society. He has also served as a volunteer for ASA since 2003.

A court qualified cannabis and synthetic cannabinoid expert; Dr. Marcu efficiently provides growth-stage companies with outsourced leadership through effectively translating complex scientific concepts to business operations for consistent, optimal results, pursuant to a company's mission and regulations. His understanding of scientific strategies, principles, and practices enables him to analyze and develop strategic business plans that provide the highest quality products for patient consumption. Dr. Marcu contributes to the conceptualization and implementation of tactics that allow for overall corporate health and growth in the cannabis field.

KRISTOPHER M. PALMER - CONSULTANT

Kristopher Palmer will aid the company in engineering a successful and cost-efficient production facility. Kristopher has been cultivating and consulting in the cannabis industry since 2010. As a head grower and director of several large cannabis corporations in Colorado, he has built and operated gardens from single warehouse sites up to a 190,000 watt operation with two different production sites, totaling approximately 18,000 sq. ft. He has extensive experience in horticulture with over 13 years experience with hydroponics such as: deep-water culture, flood and drain, top feed, and nutrient flow technology. Kristopher has created operational protocols ingrained into business models, which typically involve the use of mediums such as: coco, soil, rock wool, and grow stones. In addition, he brings over 5 years of experience with aeroponics and commercial growing operations in the State of Colorado.

Throughout his years working in the industry, Kristopher has consulted multiple cannabis cultivation operations, providing services regarding their business models, cultivation design, compliance, and overall resourceful operational procedures. As the founder and owner of THConsulting, Kristopher has invested much time into cannabis product testing and development specific to indoor cultivation and hydroponics. From his past experiences, Palmer brings tactical focus and foresight to the company. He applies a broad understanding to the design of cultivation operations based on the facility and space allotted. Kristopher's knowledge and experience engineering cannabis cultivation operations has generated successful results for multiple companies. He has had the advantage of helping multiple cannabis facilities allocate and improve costly problems that could have been avoided by proper setup and design. Kristopher's longstanding experience in construction, cannabis cultivation, and consulting enable him to be an extremely valuable asset to the company. He applies his years of experience and knowledge to building cost-effective, and highly efficient operational designs created to reduce the amount of work hours required and increase the yields of healthy plans for each harvest. His eighteen years in the construction industry allows him to bridge a major gap between engineering efficient facilities and creating productive cultivation areas.

JOSH STANLEY - ADVISOR

Josh Stanley is a leading medical cannabis entrepreneur and advocate working to advance the medical cannabis industry in the U.S. and throughout the world. Stanley brings to the company over eight years of experience working in the cannabis industry and additionally was one of the first individuals to open a medical cannabis dispensary in Denver, Colorado. Stanley has been heavily involved in responsible cannabis reform and began Colorado's political action committee and 501c4, the Medical Marijuana Industry Group, which he co-chaired. In 2010, Stanley assisted in the drafting of House Bill 1284, the first bill of its kind to further define and establish Colorado's medical cannabis state regulatory structure through the Colorado Department of Revenue. The following year he co-authored House Bill 1043 and was responsible for writing the research and development portion of the bill. Additionally, Stanley has developed rules and regulations for the Colorado Department of Revenue's Medical Marijuana Enforcement Division as well as the rules and sat on the rules and regulations board for research and development.

Stanley has been co-credited with creating a non-psychoactive strain of the cannabis plant with low-THC and high-CBD content. This specialized breed of sativa variety of medical cannabis has proven to be highly beneficial for varying degrees of epilepsy in both pediatric and adult patients. Stanley's effort to help children patients restore their lives with high-CBD cannabis extracts made international headlines in 2013 and was prominently featured on Sanjay Gupta's highly acclaimed CNN documentary in March of 2014. In addition, Stanley worked with the National Geographic Channel, who tracked his observational research studies and patient successes with medicinal cannabis in Colorado.

In April 2012, Stanley and his five brothers co-founded the "Realm of Caring," a nonprofit organization, committed to promoting a higher-quality of life for Coloradans affected by debilitating conditions through the use of non-smokable forms of concentrated CBD cannabis oil. In 2014, Josh founded "Strains of Hope," a nonprofit dedicated to assisting principalities across the globe in the implementation of responsible rules and regulations of the cannabis industry and to provide further medical research of the cannabis plant as it pertains to a variety of illnesses and disease states.

Part 3.A.1.b. Experience cultivating in Florida plants not native to Florida

Chestnut Hill Tree Farm propagates and grows over 100 varieties of fruit, and flowering and landscape varieties of trees and plants, many of which are not native to Florida. These non-native plants to the state include, but are not limited to, varieties of: hybrid chestnuts, apple, peach, nectarine, plum, pear, plum, Oriental persimmons, grape, fig, berries, banana, mango, avocado, citrus, pomegranate, flowering pear, Chinese fringetree, and the Taiwan flowering cherry.

The company propagates all its non-native plants by seed (requiring specific cold stratification and germination techniques) by rooting cuttings and budding/grafting. A number of these varieties require specific processes adjusted for each plant to be able to be successfully grown in Florida's mild winter and high humidity summer environments. For certain species, specific integrated pest management practices must be employed in this environment and, for others, certain nutrient and organic sprays must be employed to prevent diseases and pests.

ROBERT D. WALLACE – CHIEF EXECUTIVE OFFICER

Robert Dunstan Wallace has broad agricultural experience in the Florida region. In 1979, he graduated from the University of Florida with High Honors in an interdisciplinary degree in Zoology and Botany. He founded Chestnut Hill Tree Farm in 1981. Since then, Chestnut Hill has sold enough trees to cover over a half a million acres of land with orchards. In 1998 and 1999, Chestnut Hill Tree Farm received recognition as one of "The Florida 100," classifying the company as the top one hundred fastest growing industries in the region. In the 1980's, Wallace wrote and received the only U.S. Plant Patent ever given to chestnut tree varieties. In his early career, he began selling trees in Florida to orchardists. Currently, the Dunstan Chestnut™ is now the most widely distributed and planted chestnut tree in America, with several thousand acres of orchards planted around the nation. Chestnut Hill Tree Farm operates on 220 acres near Gainesville, FL and staffs twenty cultivators.

Chestnut Hill Tree Farm specializes in chestnuts, nuts, and a wide variety of edible fruit trees that are adapted to Florida's mild winter climates. Wallace has bred and selected varieties of fruit and flowering trees, including the Freedom Flowering Pear and introduced new varieties of Oriental persimmon such as Saijo and Ichikikeijiro, Taiwan cherry, Chinese fringetree and other plants to the horticultural industry in the U.S. Chestnut Hill works with the University of Florida - College of Agriculture to market fruit varieties bred by UF, and pays royalties to the University of Florida Foundation.

DEBORAH A. GAW – CHIEF FINANCIAL OFFICER

As co-owner of Chestnut Hill Tree Farm for over thirty years, Deborah A. Gaw has been a leader in the introduction and marketing of new fruit and nut varieties for the horticulture market in both the Florida Region and across the US. Gaw received a Bachelor's of Science in horticulture and pre-med from the University of Florida ("UF") in 1978. She became a biological scientist for the UF Department of Horticulture for seven years, conducting a wide number of research projects in plant physiology and post-harvest physiology. Due to her strong background in chemistry, she managed and directed the Department's plant tissue analysis laboratory for four years, which involved kjeldahl nitrogen analysis and atomic mass spectroscopy. Gaw was responsible for directing all laboratory operations and ensuring each staff member and UF student utilized best practices, from preparing sample tissue and reagents, maintaining a sterile, contaminant-free work environment (acid washing of all lab ware and surfaces), performing analysis and maintaining/calibrating the equipment, ordering/handling gases and all supplies, and summarizing and presenting data. Gaw's experience educating students, master gardener classes, extension agencies, and other stakeholders on horticultural and propagation techniques will be invaluable to the company for developing internal training programs.

When her boss retired, the Department decided to close the lab and Gaw went to work for the Department Chairman, performing research on post-harvest physiology of flowering crops for the next three years. This involved work with environmentally controlled flowering crops such as chrysanthemums, poinsettias and azaleas. Gaw gained proficient experience with all aspects of cultivation with both long and short day crops in Florida's unique climate, from potting up small liners, using black cloth (or lighting) to promoting flowering during the production stage, then conducting studies on varying post-harvest conditions such as: light, fertilizer and watering regimes. She also took several graduate classes in electron microscopy, statistics, and plant breeding, which gave her the unique opportunity to assist several graduate students and staff members with a wide diversity of horticultural research over the years.

During her thirty years of experience directing cultivation operations at Chestnut Hill, Gaw specialized in plant propagation and led greenhouse production processes. An expert in clonal plant propagation through rooting, micro propagation, and grafting. In addition, she has ample knowledge of integrated pest management, plant nutrition, water, and all aspects of nursery production in the Florida Region.

Gaw has been instrumental to Chestnut Tree Hill Farm's introduction, propagation, and marketing of new fruit and nut varieties, including the Dunstan Chestnut™, Oriental persimmons, low chill apples, peaches, pears, nectarines and plums, and cold hardy avocados. She is a founding member of the Florida Pomegranate Association, in addition to holding active memberships in many horticultural organizations including: The Northern Nut Growers Association, North American Fruit Explorers, and a founding member of The Chestnut Growers of America.

ROBERT D. WALLACE – CHIEF EXECUTIVE OFFICER

Chestnut Hill has a thirty-five year history in the introduction of new plant varieties to American horticulture, orchards, and forests. Robert Wallace, the founder of the Chestnut Growers of America, has been a trailblazer in the establishment of chestnuts as a new commercial orchard crop in America. In addition, Wallace's contributions to the agricultural industry have given abundant benefits to the hunting industry by attracting more wildlife to the region. Furthermore, Wallace is responsible for introducing an economic market for chestnut trees. Currently, he is responsible for selling the largest quantity of chestnut trees annually in America. Since 1981, Chestnut Hill has sold enough trees to cover over a half a million acres of land with orchards. In 1998 and 1999, Chestnut Hill Tree Farm received recognition as one of "The Florida 100," classifying the company as one of the top one hundred fastest growing industries in the state.

In addition to Wallace's achievement introducing a new variety of chestnut tree, the Dunstan Chestnut™, Wallace has also introduced the Freedom Flowering Pear, a disease-resistant callyerana pear, multiple varieties of Taiwan flowering cherry, Chinese fringetree and many varieties of Oriental persimmon, such as the Saijo and Ichi-ki-kei-jiro, which have become the basis for the persimmon industry in the eastern U.S. Chestnut Hill Tree Farm is a licensed propagator of the University of Florida ("UF") Foundation, and sells a number of fruit varieties patented by UF breeders and pays royalties to the Foundation.

DEBORAH GAW – CHIEF FINANCIAL OFFICER

As an owner of Chestnut Hill Tree Farm for over thirty years, Deborah Gaw has been a leader in the introduction and marketing of new fruit and nut varieties for the horticulture market in both the Florida Region and across the US. Gaw received a Bachelor's of Science in horticulture from the University of Florida in 1978. She was a biological scientist for the UF Department of Horticulture for seven years, conducting a wide number of research projects in plant physiology and post-harvest physiology. In this position, she managed and directed a laboratory and is proficient in a number of laboratory techniques, including electron microscopy.

Gaw has been instrumental to Chestnut Tree Hill Farm's introduction, propagation and marketing of new fruit and nut varieties, including the Dunstan Chestnut ™, Oriental persimmons, low chill apples, peaches, pears, nectarines and plums, and cold hardy avocados. She is a founding member of the Florida Pomegranate Association, in addition to holding active memberships in many horticultural organizations including: The Northern Nut Growers Association, North American Fruit Explorers, and a founding member of The Chestnut Growers of America.

Chestnut Hill Tree Farm has thirty years of propagation and cultivation experience in a wide diversity of plant species and varieties of trees, fruit, berries, herbaceous plants, and shrubs. In north Florida, the weather allows production of temperate species from the hardwood forest (such as oaks, maples, magnolias, hollies, etc.), and tropical species at the northern edge of their range (such as citrus, avocados, bananas, guavas, etc.). Chestnut Hill specializes in low chill pome and stone fruit varieties, such as apples and peaches, which have been bred to be adapted to the mild winters in Florida. The company is also efficient in growing diverse varieties of plant species have the ability to be grown and bear fruit in South Florida, Central Florida, and North Florida (as well as throughout the eastern US) based upon different chilling requirements. Due to these plant species' temperate and unique environmental requirements, these cultivars are be marketed and sold only to certain areas in the region where they are able to flourish and produce fruit.

ROBERT D. WALLACE – CHIEF EXECUTIVE OFFICER

Robert Dunstan Wallace has broad agricultural experience in the Florida region. In 1979, he graduated from the University of Florida with High Honors in an interdisciplinary degree in Zoology and Botany. He founded Chestnut Hill Tree Farm in 1981. Since then, Chestnut Hill has sold enough trees to cover over a half a million acres of land with orchards. In 1998 and 1999, Chestnut Hill Tree Farm received recognition as one of "The Florida 100," classifying the company as one of the top one hundred fastest growing industries in the state. In the 1980's, Wallace wrote and received the only U.S. Plant Patent ever given for chestnut tree varieties. In his early career, he began selling trees in Florida to orchardists. Currently, the Dunstan Chestnut™ is now the most widely distributed and planted chestnut tree in America, with several thousand acres of orchards planted around the nation. Chestnut Hill Tree Farm operates on 220 acres near Gainesville, Florida and staffs twenty cultivators.

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Gaw began performing research on post-harvest physiology of flowering crops for the next three years. This involved work with environmentally controlled flowering crops such as chrysanthemums, poinsettias and azaleas. Gaw gained proficient experience with all aspects of cultivation with both long and short day crops in Florida's unique climate, from potting up small liners, using black cloth (or lighting) to promoting flowering during the production stage, then conducting studies on varying post-harvest conditions such as: light, fertilizer and watering regimes. She also took several graduate classes in electron microscopy, statistics, and plant breeding, which gave her the unique opportunity to assist several graduate students and staff members with a wide diversity

of horticultural research over the years. Gaw's experience educating students, master gardener classes, extension agencies, and other stakeholders on horticultural and propagation techniques will be invaluable to the company for developing internal training programs. Gaw will assist the company's Cultivation Director by providing input on the regional conditions that will impact the cannabis plant.

During her thirty years of experience directing cultivation operations at Chestnut Hill, Gaw specialized in plant propagation and led greenhouse production processes. An expert in clonal plant propagation through rooting, micro propagation, and grafting. In addition, she has ample knowledge of integrated pest management, plant nutrition, water, and all aspects of nursery production in the Florida Region.

SAMUEL GLUCKSMAN, DPM - CONSULTANT

Samuel Glucksman, DPM, the crop management specialist and primary account manager at Glades Crop Care, Inc. currently directs all cultivation operations for the East coast and Homestead divisions. With an extensive educational background in horticulture, receiving a B.S. in botany and PhD in plant medicine from the University of Florida, his continuing experience in the agriculture industry has led him to be a skilled expert and frontrunner in the cultivation and research of diverse plants. He has successfully developed detailed protocols for company operations from diligent field research, providing growers with the best possible organic and conventional recommendations to solve pest, disease, and cultural issues (i.e. pesticide application, etc.). He has directed environmental controls and pest management, providing help to individual's growing issues. Additionally, Dr. Glucksman is an expert in good agricultural practices, and heads the human resources, administrative, and customer service departments at Glades Crop Care, Inc.

A seasoned and researched cultivator and superintent in the horticulture industry, Dr. Glucksman's successful career has provided him with vast regional knowledge. Dr. Glucksman is considered a leader in the agriculture industry in Florida resulting from years of research and experience growing and harvesting crops in the State. His roles in the industry have ranged from a field technician and graduate assistant at the University of Florida, to the assistant field studies coordinator and crop management specialist at Glades Crop Care, Inc.

Dr. Glucksman's established knowledge and long-term involvement in the scientific field enables him to bridge production optimization and research enhancements in plant medicine to the cannabis cultivation industry. Years of progressive experience in the field enable Dr. Glucksman to bring valuable scientific research and advisory services to the company. Dr. Glucksman will be an important asset in the development of the company's fundamental and compliant production practices.

Part 3.A.1.e. Experience cultivating plants for human consumption such as food or medicine products

Chestnut Hill Tree Farm specializes in the cultivation of trees and plants for production of nuts and fruit. These include, but are not limited to: chestnuts, pecans, apples, peaches, pears, plums, figs, pomegranates, blueberries, grapes, black and raspberries, persimmons, mulberries, citrus, bananas, avocados, and many other edible fruits. Chestnut Hill maintains varietal orchards for clonal production of budwood and stock for cuttings and propagation. These methods ensure that every plant produced comes from a known parent plant, avoiding the confusion of varieties or the chance at genetic drift from propagation of plants many generations removed from the original cultivar. Chestnut Hill grows its fruit with minimal, if any, additive sprays or treatments for diseases and pests. The company's business model treats outbreaks with as judicious use of chemicals as possible. Chestnut Hill also sells varied fruit and nuts produced to local retail consumers in its orchards.

ROBERT D. WALLACE – CHIEF EXECUTIVE OFFICER

As founder and owner of Chestnut Hill Tree Farm, Robert Dunstan Wallace has directed and guided cultivation operations, producing a wide-range of nuts and fruits for human consumption. Robert Wallace, the founder of the Chestnut Growers of America, has been a national leading pioneer in the establishment of chestnuts returning to the US as a new commercial orchard crop. He is responsible for introducing an economic market and chestnut industry in the country. Chestnuts were once an important tree species in North America, but were killed by a disease called the chestnut blight, in the early 1900's. Wallace's grandfather, noted plant breeder Dr. Robert T. Dunstan, bred the Dunstan Chestnut ™, a hybrid of American and Chinese chestnuts that are blight resistant. Wallace, the proud son of Dr. A.T. Wallace, (the former Dean for Research at the University of Florida College of Agriculture) learned critical agricultural techniques and gained extensive experience in cultivation early in life from both his father and grandfather. Currently, Wallace owns and operates Chestnut Hill Tree Farms, which specializes in chestnuts, nuts, and a wide variety of edible fruit trees that are adapted to Florida's mild winter climates. Additionally, Wallace founded Chestnut Hill Orchards, a company that imports unique chestnut food products from Europe to stimulate consumption of chestnuts in the U.S. These products are sold to specialty retailers across the nation, such as Whole Foods Market.

DEBORAH A. GAW - CHIEF FINANCIAL OFFICER

Deborah A. Gaw has been instrumental to Chestnut Tree Hill Farm's cultivation, introduction, propagation, and marketing of new fruit and nut varieties produced for human consumption, including the Dunstan Chestnut ™, Oriental persimmons, low chill apples, peaches, pears, nectarines and plums, and cold hardy avocados. She is a founding member of the Florida Pomegranate Association, in addition to holding active memberships in many horticultural organizations including: The Northern Nut Growers Association, North American Fruit Explorers, and a founding member of The Chestnut Growers of America.

BRADY BLAKE - CONSULTANT

Blake's pervasive knowledge regarding the cultivation of cannabis and the crop's medicinal properties causes him to be a valuable asset to the company's business model and future patients. He has personally worked with and cultivated over one hundred strains of cannabis for human consumption, and has a deep understanding of each strain's particular medicinal benefits and relief of ailments. His continual research in the production process of cannabis has provided the benefit of witnessing the powerful healing cannabis provides to individuals. Blake's past experience with soft skills training, combined with his naturally compassionate attitude, help him articulate the effects of medicinal cannabis to current and future patients. Blake is driven to educate the public on the medicinal therapies cannabis provides and produce high-grade, quality medicine.

CODI COLEMAN – CULTIVATION DIRECTOR

Codi Coleman has directed production departments of cannabis operations since 2009. During this time, he specifically serviced patients with quality medicinal cannabis products, which are produced organically, removing any possibility of chemically derived residuals. In addition, he has experience growing his own vegetables for personal consumption, including: tomatoes, kale, and onion.

JILL LAMOUREUX - ADVISOR

Jill Lamoureux assisted the company with the development of best management practice for the company's production of cannabis medicine products. Her experience includes four years of formulation experience. Lamoureux developed cannabis based medicine products from 2008 to 2012. At the time, virtually no evidence based research existed to provide guidance on these formulations. Analytical testing of cannabis was also in its infancy. This lack of data required operators like Lamoureux to develop formulas that enhanced the medicinal properties of the cannabis strains that they possessed and cultivated. For example, if patients reported that a strain relieved nausea, this strain would be used in a sublingual or suppository formulation created for those with gastrointestinal disorders that prevented them from ingesting medicinal products. This experience gave Lamoureux insight into breeding plant stock to strengthen a plant's reported medicinal qualities. Based on her experience cultivating plants for condition specific cannabis medicines, Lamoureux developed one of the most robust quality control programs in the country. When properly implemented, these protocols ensure safe and purity cannabis medicine products for patients. These protocols will be implemented by the company and supervised by the Quality Assurance Officer.

KRISTOPHER M. PALMER - CONSULTANT

As the head grower and facility manager at both CO Alternative Medicine and 3D Cannabis Center in Colorado, Kristopher Palmer has expansively worked with patients, providing them with medicinal cannabis since 2010. He has developed and integrated management programs and operational protocols in compliance to best practices that have increased production, reduced labor-intensive processes, and eased day-to-day procedures. He has been responsible for creating proficient training manuals that organize and streamline production methods, has developed commercial hydroponic systems with a focus on sanitation, grow medium preparation, and production planning. His successful cultivation methods have increased production operations by more than 300 percent in less than twelve months, providing medicinal products to thousands of patients in the Colorado area.

JOSH STANLEY - ADVISOR

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varying degrees of epilepsy in both pediatric and adult patients. Stanley's effort to help children patients restore their lives with high-CBD cannabis extracts made international headlines in 2013 and was prominently featured on Sanjay Gupta's highly acclaimed CNN documentary in March of 2014. In addition, Stanley worked with the National Geographic Channel, who tracked his observational research studies and patient successes with medicinal cannabis in Colorado.

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Part 3.A.1.f. Experience with in-house propagation

Chestnut Hill Tree Farms completes all propagation in-house, and only rarely purchases liners for step-up to larger sizes, which is standard practice for most nurseries in the industry. In addition, Chestnut Hill germinates seeds collected in stock orchards on the farm such as: chestnuts, cherries, dogwoods, redbuds, pears, oaks, persimmons and others. Each seed is stratified and germinated using a variety of different techniques and best practices. Chestnut Hill also maintains a 10,000 square foot mist propagation house, with adequate space allocated to root cuttings requiring different preparation and hormone regimes. The company propagates a variety of cultivars including: berries, figs, peach rootstock, grapes, pomegranates, and very difficult to root species including live oaks and magnolias. Chestnut Hill also propagates a number of cultivars by the ancient art and difficult process of grafting and budding, including: persimmons, apples, peaches, pears, plums, citrus and others. These methods produce clonal varieties of specific rootstocks adapted for particular uses.

DEBORAH A. GAW - CHIEF FINANCIAL OFFICER

Deborah Gaw managed and directed the plant tissue analysis laboratory for four years University of Florida's Department of Horticulture, which involved kjeldahl nitrogen analysis and atomic mass spectroscopy. Gaw was responsible for directing all laboratory operations and ensuring each staff member and UF student utilized best practices, from preparing sample tissue and reagents, maintaining a sterile, contaminant-free work environment (acid washing of all lab ware and surfaces), performing analysis and maintaining/calibrating the equipment, ordering/handling gases and all supplies, and summarizing and presenting data.

During her thirty years of experience directing cultivation operations at Chestnut Hill, Gaw specialized in plant propagation and led greenhouse production processes. An expert in clonal plant propagation through rooting, micro propagation, and grafting. The company will leverage Gaw's unique blend of horticulture and business expertise to grow and expand the business by managing the fiscal integrity of the operation and providing strategic vision and guidance. Gaw's years of experience in academia and business will provide the company with a seasoned and invested executive who also encourages innovation. She will mentor new hires and help the company's new hires and advisors navigate the realities of operating a horticulture business in Florida.

CODI COLEMAN – CULTIVATION DIRECTOR

Codi Coleman has studied, developed, and applied propagation methods to countless cannabis crops since he started cultivation six years ago. Coleman currently own and operates his own propagation greenhouse, which has given him experience creating propagation protocols and crop timelines. Additionally, he uses a 120-cell aeroponic cloning machine, personally cutting all of his own products and providing patients with cuttings.

ROBERT D. WALLACE – CHIEF EXECUTIVE OFFICER

Robert Dunstan Wallace has longstanding experience with genetically modifying and breeding an abundantly different variety of agricultural crops. Wallace has been gaining knowledge and experience in the genetically modifying and breeding crops since his early childhood. Wallace's grandfather, Robert Dunstan, was the breeder of the Dunstan Chestnut ™, the most widely planted, blight resistant chestnut in the United States. Dunstan was the first person to hybridize the American muscadine and the European bunch grape, which was created by doubling the number of chromosomes with colchine and creating a fertile hybrid in the tetraploid (double chromosomal structure). Wallace's father, Dr. A. T. Wallace, was a plant geneticist and the Dean of Research for the University of Florida's College of Agriculture. Wallace has carried on this history of plant breeding and introduction, selecting and patenting four varieties of chestnut trees, which species became the only patents ever issued for chestnut varieties. He has bred and selected a number of varieties of plants, including: chestnuts, persimmons, cherries, flowering pears, dogwoods and edible fruits. Wallace has an intimate knowledge in the physical process of cross-pollination, backcross breeding theory and techniques, plant genetics, and the selection of new varieties of plants.

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Chestnut Hill Tree Farm will implement a clean cultivation facility. A combination of sanitation protocols and good agricultural practice for environmental control will establish an ISO Class 7 rating throughout the operation. In comparison, normal untreated air quality is typically rated ISO Class 9. This ISO Class 7 rating is more than sufficient for cultivation operations and will provide adequate protection against particulate contamination. In accordance with best practice for botanical science, ISO Class 5 portable laminar flow cabinets will be used for tissue culture and cloning operations. These portable cabinets allow for cleanroom technologies required for these delicate tissue culture activities without the expense of an entire clean growing room.

CODI COLEMAN – CULTIVATION DIRECTOR

Codi Coleman has wide-ranging experience incorporating sanitation procedures into all cultivation operations, including propagation methods and upholding clean growing facilities in accordance to best practices. As the owner of a cultivation operation, Coleman oversees quality assurance and ensures good agricultural practices are properly ingrained in all production methods, including the use of clean growing rooms.

DEBORAH A. GAW - CHIEF FINANCIAL OFFICER

Deborah Gaw managed and directed the plant tissue analysis laboratory for four years at the University of Florida's Department of Horticulture. Gaw was responsible for directing all laboratory operations, including the "clean room" environmental controls required in the lab and ensuring each staff member and student utilized best practices, from preparing sample tissue and reagents, maintaining a sterile, contaminant-free work environment (acid washing of all lab ware and surfaces), performing analysis and maintaining/calibrating the equipment, ordering/handling gases and all supplies, and summarizing and presenting data.

JILL LAMOUREUX - ADVISOR

During her consulting contract with CannLabs, Jill Lamoureux, the company's operations advisor assisted in the development of two cleanroom projects for tissue culture operations. With the input of industry leading tissue culture experts and the CannLabs scientific team, Lamoureux compiled the equipment specifications and protocols for these projects. Chestnut Hill Tree Farm will implement a clean cultivation facility. A combination of sanitation protocols and good agricultural practice for environmental control will establish an ISO Class 7 rating throughout the operation. In comparison, normal untreated air quality is typically rated ISO Class 9. This ISO Class 7 rating is more than sufficient for cultivation operations and will provide adequate protection against particulate contamination. In accordance with best practice for botanical science, ISO Class 5 portable laminar flow cabinets will be used for tissue culture and cloning operations. These portable cabinets allow for cleanroom technologies required for these delicate tissue culture activities without the expense of an entire clean room area.

KRISTOPHER M. PALMER - CONSULTANT

As an experienced engineer of cultivation facilities, Kristopher Palmer has designed, built, and managed multiple clean growing rooms in full compliance to best practices. As the head grower and facility manager at both CO Alternative Medicine and 3D Cannabis Center in Colorado, Palmer has developed proficient cultivation training manuals for employees specific to indoor hydroponic systems with a focus on sanitation, grow medium preparation, and production planning. As a director of cultivation operations, Palmer has experience developing, implementing, and maintaining sanitation and quality control practices for multiple cultivation operations that have maintained the safety and quality of crops, including purity and consistency. To prevent contamination of cannabis and cannabis products, Palmer has developed written procedures that ensure all cultivation facilities apply proper sanitation

protocols into daily operation. Currently, Palmer is working with Denver Water and the Denver Department of Environmental Health to develop a best practice guide for commercial cannabis cultivation.

Part 3.A.1.i. Knowledge of cannabis cultivation

i. Proper cultivation conditions and techniques;
ii. Additives that can be used when growing cannabis;
iii. Pests, disease and deficiencies common for cannabis;
iv. Production of high quality product in a short time;

Commercial medicinal cannabis cultivation is a new industry in Florida. As a result, the company has enlisted industry leaders with national cultivation expertise to develop cultivation plans and protocols.

CODI COLEMAN – CULTIVATION DIRECTOR

Throughout his six years cultivating cannabis, Codi Coleman has worked in multiple grow operations, combating specific nuances and deficiencies common to a cannabis microclimate. By applying specific nutrients to the soil, Coleman has been able to produce healthy plants that flourish with the proper organic additives and experience no pest or disease problems. Coleman also applies methods of light depravation to produce high quality product in short timelines.

JILL LAMOUREUX - ADVISOR

Jill Lamoureux drafted the company's cultivation Standard Operating Procedures ("SOPs") in coordination with the company's team of cultivators. Lamoureux has developed these protocols over the past eight years beginning with her own cultivation facilities in Colorado. Her operations served as an example to Colorado regulators when they developed the first statewide medical cannabis legislation and regulation in the country. Lamoureux was asked to serve on two of the workgroups that created those rules and still works with many of the regulators today.

In 2009, Lamoureux engaged the services of a Certified Professional Horticulturalist to develop best management practices for her cultivation operations, as no industry standards existed at the time. The resulting document was the first edition of the textbook, Cannabis for Capitalists. Lamoureux provided these standards and expanded on them during the development of the American Herbal Products Association's recommendation to regulators for cannabis operations. The standards addressing cultivation conditions, components, IPM, and production standards were further adapted to mirror USDA organic standards as required for producers in Massachusetts and Connecticut. These protocols which will be implemented by the company have been proven successful in producing safe and effective medical cannabis in a highly regulated yet efficient manner.

KRISTOPHER M. PALMER - CONSULTANT

As a founder and owner of THConsulting in Colorado, Kristopher Palmer provides exceptional services to the rapidly growing medical cannabis industry. His broad knowledge of state compliance, quality assurance, cultivation facility design, and operational development has given him expertise in the medical cannabis field. Palmer's deep understanding of cannabis cultivation and quality assurance has helped him develop an integrated pest management program for cultivation operations, which is continually updated as new products and information become available. He has engineered cultivation facilities that were designed, maintained, and monitored to restrict pests, disease and deficiencies common for cannabis. In addition, Palmer has developed and integrated operational manuals and pest management protocols that comply with good agriculture practices, company polices, and procedures. Furthermore, Palmer has developed and implemented company manuals designed to educate and train employees to utilize good agricultural practices in day-to-day operations. Currently, Palmer is working with Denver Water and the Denver Department of Environmental Health to develop a best practice guide for commercial cannabis cultivation.

Palmer brings strategic focus and advanced judgment gained during a successful career guiding the creation of operational protocols focused on: sanitation, grow medium preparation, and production planning. His advisory and management services have generated sustained production growth to cultivation companies operating in the cannabis industry. As a part owner, head grower, and facility manager at 3D Cannabis Center in Colorado, Palmer's efficient cultivation model increased production by over 300% in less than twelve months. Recently, he began participating in control experiments to test various additives and fertilizers on cannabis, both organic and synthetic. Palmer's know-how and long-term involvement in the cannabis field enables him to leverage diverse business optimization to a variety of cultivation operations in the cannabis industry.

CULTIVATION

The Cultivation Director will employ methods that are based on organic standards to produce clean and safe input materials for our Derivative Products. Despite the fact that the company's operating plans have been developed and executed by industry experts across the country, no existing market produces Derivative Products only, especially in such a hot and humid climate. As a result, the company will adapt the plan based on the realities on the ground and will adopt new industry techniques as they evolve in effort to maintain a system of continuous improvement.

Consistent, high quality cultivation practices across the entire growth cycle of the cannabis plant, the source of the natural compounds needed to produce medical cannabis, is the single most important part of the company's model. Healthy and vibrant plants yield higher quality products. The more effective the organization is at cultivating high-yielding and fast-growing plants, the more affordable high-quality products will be for patients who need medical cannabis.

STANDARD OPERATING PROCEDURES

The Cultivation Director will develop and update the company's cultivation SOPs when OCU regulations are added or revised and when industry best practice dictates a revision. SOPs that contain description of practices and procedures required including the frequency with which they will be performed will be developed, implemented, and maintained including:

- A list of each substance to be used as a production or handling input, indicating its composition, source, location(s) where it will be used, and documentation of commercial availability, as applicable. This list will be maintained by the Cultivation Director electronically in the crop management system;
- A description of the monitoring practices and procedures to be performed and maintained, including the frequency with which they will be performed, to verify that the plan is effectively implemented; and
- A description of the recordkeeping system implemented to comply with the requirements established.

The Cultivation Director will designate a small procedure variance team. This team is responsible for assessing the impact of any variation of procedure. This measure is to ensure a risk assessment and thorough decision-making process was executed before a change in procedure occurs. It is the policy of the company that the team meets and discusses the implementation and assesses the impact of any potential change in procedure before the procedure is authorized by the Cultivation Director. The Director will be notified of any variance from the published protocol and the change will be recorded in the procedure variance log in the crop management system.

PROCESS

PROPAGATION

All propagation material will be properly identified by genus, species, variety, and chemotype. The Cultivation Director will ensure that all plants are traceable to origin, and are free of pests and disease. To reduce the occurrence of male plants, which causes seed fertilization, cutting of female (or mother) plants will be the primary method of propagation of the company. Mother plants will be selected by observing which appear to be the healthiest and strongest plants. In addition, plants expressing a lack of chlorophyll through a yellow coloring will not be considered for propagation. The Cultivation Director will ensure that the presence of male plants and different species, strains, or different plant parts are monitored and removed if present during the entire production process (propagation, cultivation, harvest, drying and packaging).

It is the company policy to enforce strict sanitation standards throughout all operations including propagation. Young plants are more susceptible to pests and disease and require additional prevention measures. The Cultivation

Director is responsible for ensuring that preparation procedures are followed prior to propagation, and that the workspace involving propagation is sanitized before and after each propagation task.

The Cultivation Director in coordination with the Chief Operating Officer and Director of Manufacturing will determine the mix of strains to be cultivated. The following items will be considered when determining strain selection:

- The availability of the strain;
- Medicinal benefits;
- Other strains currently in production;
- Average yield;
- Length of cultivation cycle;
- Patient demand;
- Amount of plant material and quality available for extraction; and
- Difficulty of processing.

Cultivation employees who propagate cannabis plants from seed, cutting, tissue culture, or any other means will keep accurate records to be entered into the inventory management system. Records will accurately identify and record the seeds or vegetative planting stock as to genus and species, and to subspecies, variety, cultivar, and/or hybrid if applicable.

Chestnut Hill Tree Farm will primarily propagate through taking cuttings, or "clones" from mother plants. Cuttings will be taken from mother plants in the vegetative stage only. The R&D lab may implement tissue culture procedures in coordination with the Cultivation Director. Employees responsible for cutting and transferring clones will be thoroughly trained on how to assess mother plants as well as cut and transfer clones using methods outlined by the company. Training will include the following items:

- Assessing and selecting mother plants;
- Preparation for cutting clones;
- Procedure for cutting clones, including root hormone applications;
- Transplanting clones; and
- Clone care, organization, and tracking.

TRANSPLANTING AND MEDIA HANDLING

The Cultivation Manager under the Director's oversight is responsible for overseeing all transplants and media handling during transplants. The following items will be taken into considerations for each transplanting activity:

- Never transplant plants into dry media, and never transplant a dry rootball into media, no matter how wet the media is.
- Gently break up compacted bales of soilless media, or "fluff", prior to transplanting.
- Avoid compacting containers or media. Containers will be lightly filled with the excess media brushed off the top. Do not stack containers.
- Add water to any peat-based media mixes before filling plug trays or pots. This will help to create more aeration. Allow the media to sit overnight after wetting so the pH can begin to adjust itself into a desired range. Failure to do this can result in low pH environments that can impact yield.
- Test the media pH, electrical conductivity, and wet ability before use.
- When transplanting, place a small amount of the moistened media in the bottom and shape around the sides of the container. Place the plant at a level it was formerly at.
- When the plant has been transplanted, gently fill in the sides and any air pockets with media.
- The following day, observe and correct any air pockets with moistened media after the second irrigation.

QUALITY ASSURANCE

The Cultivation Director, in coordination with the Quality Assurance Officer, will develop, implement, and maintain sanitation and quality control practices that maintain the safety and quality of crops, including purity and consistency. All necessary precautions will be taken during the cultivation and processing of cannabis to prevent contamination of medical cannabis and packaging materials. The Cultivation Director will establish surveillance schedules for each crop in cultivation. Detailed visual surveillance of each crop will be performed and documented weekly at a minimum. Cultivation employees performing surveillance will look for and record findings for the cultivation area assigned. The following items at a minimum will be included in surveillance operations:

- Signs of pest infestations.
- Changes in biological colonies.
- Mold and mildew.
- Leaf and tip burn, discoloration, and spotting.
- Changes in appearance of the media.
- Changes in stalk density and branch elasticity.

Regular in-house testing will be scheduled by the Cultivation Director based on current operational needs and recorded in the crop management system. Tests that will be performed include:

- Soil pH
- Nutrient pH, Total Dissolved Solids ("TDS"), and Electro-Conductivity ("EC")
- Soil EC/pH testing using a saturated media extraction (1 part soil to 2 parts water filtered) or the leachate pour-through method
- Water Oxidation Reduction Potential ("ORP")

All crops will be inspected by two or more trained employees for all visible foreign matter and sub-standard material to be removed. These employees will also perform a visual microscopic and naked-eye inspection of each crop processed to determine:

- Organoleptic characteristics (color, texture and odor);
- Presentation of the material (raw, cut, crushed, compressed);
- The presence of admixtures, foreign matter (sand, glass particles, dirt), mold, or signs of decay;
- The presence of insects; and
- The presence of foreign material originating from poor or degraded containers.

Damaged and/or degraded plant material will be removed and disposed of with cultivation manager approval and in accordance with waste disposal policies and procedures.

The Cultivation Director 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 production area; such written procedures will be followed, and records of cleaning and sanitation will be kept in the crop management system. UV sterilization door strips and dip tanks will be used in critical locations throughout the facility. Frequent hand-washing is necessary in all crop handling activities and will be enforced by the Cultivation Director.

All cannabis waste from cultivation operations will be disposed of in accordance with waste disposal policies and procedures. All other cultivation waste will be stored and disposed of as to:

- Minimize the development of odors;
- Minimize the potential for waste to attract, harbor, or become a breeding place for pests;
- Protect against contamination of cannabis, contact surfaces, water supplies, and grounds surrounding the facility; and

- Control hazardous waste to prevent contamination of cannabis, contact surfaces, water supplies, and grounds surrounding the facility.

REPRESENTATIVE SAMPLING

Representative samples sufficient in size will be taken from each batch (each strain will be tested) by the quality assurance unit. Analytical samples will be taken in accordance with sampling and retention policies. Representative samples removed from cultivation inventory will be properly recorded in the inventory management system. Sample records will accurately reflect the origination of the sample to allow trace-back. Samples will be recorded in the inventory control system with the contents by:

- The plant name and identification;
- The date of harvest;
- The identification number; and
- Any other identifying information.

Samples will be stored separately from product inventories in a manner that maintains sample quality and identification.

BRADY BLAKE - CONSULTANT

As a quality control manager at Colorado Alternative Medicine, Blake gained extensive experience implementing and operating Colorado's State mandated tracking software system, Marijuana Inventory Tracking System, which efficiently tracks each crop from seed-to-sale. He believes his experience using the company's prior point-of-sale inventory software program, MMJ Freeway, provided a smooth transition to the use of a more advanced and efficient technology base. In 2013, Blake was promoted to a senior management position. He became responsible for the care and tracking of over 4,000 plants and approximately twenty new employees in a grow facility housing 240,000 watts of flower production.

CODI COLEMAN – CULTIVATION DIRECTOR

As a leader in quality assurance and cannabis production, Coleman begins his cultivation process by tracking and labeling each product from the moment the crop is propagated. He applies a seed-to-sale system to keep track of each plant he harvests. His methods involve full compliance to all laws and regulations.

JILL LAMOUREUX - ADVISOR

Jill Lamoureux has been a cannabis industry frontrunner in the State of Colorado since 2008, when she and her husband created one of the Colorado's most respected multi-location dispensing operations. Their branches of business consisted of four retail stores, three cultivation operations, and one cannabis kitchen. As a former dispensary and cultivation owner and operator, she brings first-hand experience with tracking all cannabis plants grown in a particular harvest. In 2010, Lamoureux worked with the State of Colorado's Medical Marijuana Enforcement Division (MMED) to develop the first statewide medical cannabis regulations regarding tracking, transparency reporting, and compliance. These regulations required every cannabis-producing plant to be tracked by the MMED through each stage of its life, from cultivation to point of sale. Since 2013, Lamoureux has served as a subject matter expert consulting to the BOTEC Analysis Corporation in cannabis regulation and policy. Recently, she provided aid to the BOTEC team advising Washington State on rule-making issues for recreational cannabis operation, including regulations concerning tracking cannabis crops from seed-to-sale.

BIOTRACKTHC

Chestnut Hill Tree Farm will integrate the BioTrackTHC system into its medical cannabis operations. BioTrackTHC's Cultivation Management System offers users with a unique solution that tracks every level of the growth process from cultivation to distribution. Every plant, seed or clone is assigned a unique non-repeatable 16 digit barcode number. Once the flower is batched after being harvested, each batch is given a new barcode while still being associated with the original source barcode. Every batch of product is separated in the inventory control module by the individual barcode for complete accountability and recall protocol. BioTrackTHC technology allows growers to assign plants into multiple rooms, giving coordination and direct view of the entire cultivation facility. Users can access the Plant Derivatives Pedigree feature to run a report on any plant, batch, plant derivative, or product, providing full visibility of plant information for the company and regulatory agencies.

BRADY BLAKE - CONSULTANT

Brady Blake has comprehensive technical abilities and know-how in compliance to the cannabis industry. Experience as a quality control and facility manager has given him the skills has to develop proficient cultivation methods that include good agricultural practices into all cultivation procedures.

CODI COLEMAN – CULTIVATION DIRECTOR

As a high-caliber cannabis cultivator, Codi Coleman has applied his knowledge of good agricultural practices to his day-to-day operations. These practices he incorporates into his methods include: conserving water, using and mixing the correct labeled rates and amounts for pesticides and growth regulators (so as not to cause plant or environmental damage or excess unused amounts), using the correct light or shade levels (in order for efficient production of sturdy, quality plants and reduce reliance on chemical use), using reliable nutrients, rotating each crop periodically, and keeping all cultivation equipment properly functioning and sanitized.

SAMUEL GLUCKSMAN, DPM - CONSULTANT

Samuel Glucksman, DPM, the crop management specialist and primary account manager at Glades Crop Care, Inc. currently directs all cultivation operations for the East coast and Homestead divisions. He has successfully developed detailed protocols for company operations from diligent field research and good agricultural practices, providing growers with the best possible business models. Dr. Glucksman is an expert in good agricultural practices, and heads the human resources, administrative, and customer service departments at Glades Crop Care, Inc.

JILL LAMOUREUX - ADVISOR

Jill Lamoureux's experience with the American Herbal Products Association's creation of regulatory health and safety standards and her development of the Patient Focus Certification audit standards have made her a national expert on good handling practice applied to cannabis operations. Chestnut Hill Tree Farm will benefit from her accumulation of this knowledge base and will implement many of these practices into the operation.

KRISTOPHER M. PALMER - CONSULTANT

As a founder and owner of THConsulting in Colorado, Palmer provides exceptional services to the rapidly growing medical cannabis industry. His broad knowledge of state compliance, quality assurance, cultivation facility design, and operational development has given him expertise in the medical cannabis field. Palmer's deep understanding of cannabis cultivation and quality assurance has helped him develop an integrated pest management program for cultivation operations, which is continually updated as new products and information become available. He has engineered cultivation facilities that were designed, maintained, and monitored to restrict pests, disease and deficiencies common for cannabis. In addition, Palmer has developed and integrated operational manuals and pest management protocols that comply with good agriculture practices, company polices, and procedures. Furthermore, Palmer has developed and implemented company manuals designed to educate and train employees to utilize good agriculture practices in day-to-day operations. Currently, Palmer is working with Denver Water and the Denver Department of Environmental Health to develop a best practice guide for commercial cannabis cultivation.

GOOD AGRICULTURAL PRACTICE

Chestnut Hill Tree Farm is dedicated to the purity and safety of its medicinal cannabis products. Best Management ("BMP"), Good Agricultural ("GAP"), Good Cultivation ("GCP"), and Good Handling Practice ("GHP") will be used throughout the cultivation operation. Food safety protocols are adopted wherever applicable. The company's SOPs have adopted or adapted the use of several publications on BMP, GAP, and GHP. While the industry has not adopted a single standard for Good Cultivation Practice, the company has adopted cannabis cultivation standards from the American Herbal Pharmacopeia and the American Herbal Products Association and adapted USDA Organic Standards and FDA standards to create a holistic crop management system specific to the cultivation of medical cannabis.

Chestnut Hill Tree Farm has adopted or adapted the use of following publications on BMP/GAP/GHP/GCP:

- An introduction to on-farm food safety practices, Canadian Federation of Agriculture.
- HACCP principles and application guidelines, National Advisory Committee on Microbiological Criteria for Foods.
- Guide to minimize microbial food safety hazards for fresh fruits and vegetables, Center for Food Safety and Applied Nutrition.
- Cannabis Cultivation Operations, American Herbal Products Association.
- A workbook on Greenhouse Gas Mitigation for Agricultural Managers, Government of Alberta, Canada, Agriculture, Food and Rural Development.

Cultivation of safe and effective crops encompasses a wide variety of holistic management practices. The Cultivation Director will implement and maintain the company's Integrated Crop Management plan ensuring healthy crops and yields. All cultivation employees are responsible for management of plant health factors as directed by the Cultivation Director, including:

- Plant selection and genetic diversity.
- Environmental control and air quality.
- Pest management.
- Water application and quality.
- Sanitation and hygiene.
- Equipment maintenance.
- Chemical applications.
- Nutritional balance.
- Early identification of deficiencies and toxicities.

BEST MANAGEMENT PRACTICE

BMP are methods or techniques found to be the most effective and practical means in achieving an objective while making the optimum use of the firm's resources. The collection of management practices used by the company including USDA Organic Standards, APHA's good cultivation practice, GAP, and GHP are part of the BMP plan. The Cultivation Director is responsible for the implementation and supervision of BMP protocols including:

Soils

- Soils will be managed properly.
- The company will maintain or improve soil organic matter.
- The appropriate application of agrochemicals and fertilizers will be used to prevent soil contamination.

Crop production

- The Cultivation Director will select appropriate cultivars or varieties responsive to cultivation practices and patient needs.
- Crop sequences will be developed for the optimal use of labor and equipment.
- Employees will apply fertilizers in a balanced fashion.
- Recycling of crop and other organic residues will be implemented whenever possible.

Crop protection

- The Cultivation Director will use resistant cultivars and maximize biological prevention of pests and diseases.

Harvest and on-farm processing and storage

- Cannabis will only be harvested following relevant pre-harvest intervals and withholding periods.
- The company will ensure clean and safe handling for processing of products through its quality assurance unit.
- All cannabis will be stored under hygienic and appropriate environmental conditions.
- Medical cannabis packaged for transport from cultivation facilities will be in appropriate and clean containers.
- Detailed records regarding harvest, storage, and processing will be maintained.

Energy and waste management

- The Cultivation Director will establish input-output plans for energy, nutrients, and agrochemicals to ensure efficient use and safe disposal.
- Energy saving practices, buildings, and machinery will be implemented throughout the operations.
- The company will recycle organic wastes and inorganic material as allowed by law.
- The operation will minimize non-usable wastes.
- All fertilizers and agrochemicals will be securely stored.
- The company will maintain records of energy use, storage, and disposal.

Human welfare, health and safety

Chestnut Hill Tree Farm, LLC is focused on the health of the patients who we serve. Our mission will guide us in contributing positively to the health and well-being of patients as well as ensuring the safe and appropriate use of the products that we deliver.

- The Cultivation Director will manage cultivation practices to achieve an optimum balance between economic, environmental, and social goals.
- All employees shall be provided with employment that provides adequate household income and food security.
- All employees will be fully trained in the safe and efficient use of chemicals, tools, and machinery.
- Environmental monitoring protocols will ensure that employees are not exposed to dangerous conditions.
- Security measures will provide a safe working environment for cultivation staff.

ENVIRONMENTAL CONTROLS

Chestnut Hill Tree Farm cultivates cannabis in a controlled environment. Controlled environments:

- Mitigate seasonal limitations and provides sanitary operations.
- Constrain unintended female pollination.
- Allow optimal cultivation conditions and maximization of cannabinoid content.

The Cultivation Director is responsible for daily monitoring of environmental factors. The closed environment is slightly pressurized. All cultivation areas will be equipped with stand-alone environmental monitoring systems and any abnormal condition will be addressed immediately including, but not limited to:

- Temperatures
- Relative humidity
- Carbon dioxide
- Bulb readings indicating necessary bulb replacement or bulb failure

Any environmental monitoring and control equipment installed in the cultivation facility will be approved by the Director, and at a minimum:

- Use a type 3 chemical detector capable of detecting carbon monoxide, low oxygen, and explosive environments;
- Provide twenty-four hour monitoring, text alerts and audible alarms;
- Contain a supplemental power source that provides twenty-four hours of operation; and
- Record and store at least thirty days of recordings including:
    1. Light readings;
    2. Temperature;
    3. Humidity; and
    4. Carbon dioxide levels.

EVAP/HVAC systems will be maintained monthly in accordance with manufacturer recommendations and temperatures monitored daily. Cultivation areas will have properly balanced ventilation systems. All intake fans will be equipped with UV, HEPA, and insect filters maintained in accordance with manufacturer recommendations and dehumidifier equipment will be installed and maintained as necessary.

Implementing a supplementary carbon dioxide ("CO_2") system can increase yield by 20 to 40% and is very common in agriculture. The company will utilize CO_2 in crop production utilizing best and safe practices. Generally, CO_2 levels will be about 900 ppm and no more than 1100 ppm.

- The Cultivation Director will ensure that all CO_2 sensors are positioned near the center of the crop and not near a CO_2 outlet.
- The Cultivation Director will also ensure that there is proper ventilation to provide an exchange of air when using CO_2.
- The Cultivation Director will ensure that CO_2 levels are being documented with nutrient levels as a component of the formula.

In addition to these responsibilities, the Cultivation Director is responsible for ensuring that all employees and employees are thoroughly trained on how to identify CO_2 poisoning, for both plants and humans, and how to respond appropriately to both of these situations.

The Cultivation Director will also ensure the regular maintenance of odor control equipment including regular cleanings and filter replacements as often as required. Odor control equipment will employ activated carbon filtration and be serviced according to manufacturer's recommendations. All environmental control adjustments and maintenance records will be entered in the crop management system and maintain for a period of no less than five years.

HYGIENE AND SANITATION

The Cultivation Director will monitor the health of all cultivation employees. The Cultivation Director will follow the Florida Administrative Code Sanitation and Safety Requirements Rule 61C-4.010. In the event the Cultivation Director believes an employee responsible for the handling of cannabis or components is ill, they will terminate the

employee's shift immediately. If upon return to work, the Cultivation Director still suspects the employee is ill, he or she will require the employee to obtain a physician's release to return to work in the facility.

GENERAL PLANT CARE

The Cultivation Director will be responsible for the implementation and maintenance of all plant care activities including:

- Plant selection and genetic diversity.
- Environmental control and air quality.
- Pest management.
- Water application and quality.
- Sanitation and hygiene.
- Equipment maintenance.
- Chemical applications.
- Nutritional balance.
- Early identification of deficiencies and toxicities.

The Director will implement a Plant Health Care Checklist as a guideline for environmental awareness and general operating procedures and will assign responsibility of tasks, determine frequency of activities, and monitor performance. The items to be monitored include the following:

- Facility and maintenance.
- Sanitation and hygiene.
- Environmental control.
- Cultivation area sanitation and plant spacing.
- Equipment and tool maintenance.
- Strain selection.
- Plant care and health.
- Integrated pest management.

CROP AND SUPPLY MANAGEMENT

The mission of the company is to provide sufficient and effective medical cannabis products to the company's patients. The Cultivation Director, in coordination with the Director of Manufacturing and Chief Executive Officer, will receive demand estimates from the dispensary operations and determine the next quarter's production supply to meet or exceed the demand. In addition to demand, the dispensary operation will report on strain selection to meet or exceed patient expectations and optimize outcomes. When implementing cultivation procedures, the Cultivation Director will consider the impact on consistency, quality, and efficacy.

A regular harvest cycle will be maintained to ensure consistent supply, maximize efficiency, and allow for effective plant management techniques. The Cultivation Director will coordinate with the Chief Executive Officer regularly to determine the appropriate level of production anticipating patient needs.

The Cultivation Director will develop production schedules that maximize yield and variety in each harvest cycle.

The Cultivation Director will maintain sufficient records to track, monitor, and make reasonable judgments about the effectiveness of crop management methods implemented. The Director will report the effectiveness of any change in cultivation procedures to the Chief Operating Officer with a detailed analysis of the change in relation to the following items:

- Cost;
- Yield;
- Efficiency;
- Employee safety;
- Required training;
- Potency;
- Other test results; and
- Feedback from physician prescribers and/or patients.

WATER QUALITY

Chestnut Hill Tree Farm recognizes the limited water resources that exist and water conservation is a primary goal of the company's operations. The Cultivation Director will test the water source quarterly, after any unusual natural event (flooding), and when PPM/pH readings change significantly. Testing will 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 used in the facility will, at a minimum, meet Human Health Standards for water quality. The following steps will be implemented to ensure water quality:

- All employees will be trained on the proper handling and storage of water with a focus on avoiding contamination.
- Water and nutrient solutions will not sit in the open environment for longer than four hours. If agitation and aeration pumps are used in holding containers it may sit in the open environment for no longer than twenty-four hours.
- No nutrient solutions will be disposed into a public drain without confirming the disposal is in accordance with applicable laws and regulations and in accordance with the manufacturer's recommendations.
- All water equipment including nozzles and hoses will be sanitized regularly.
- Only highly trained employees will be responsible for irrigation. Cannabis has a low crop coefficient and will typically require approximately five gallons per 45 square feet.
- Plants will be grouped by strains for watering efficiency.
- Irrigation equipment will be professionally maintained per the manufacturer's recommendations. Any parts that may be a source of contamination will be cleaned and replaced as often as needed.
- If plants are flooded or root balls remain in high moisture, careful inspection for Pythium induced root rot will be performed regularly.
- Employees will check for signs of water quality changes daily including:
    1. Build-up of lime scale indicating high calcium and magnesium or sulfate.
    2. Red and black particles and stained fixtures indicating high iron or manganese.
    3. Cloudiness indicating increased levels of chloride.
    4. A rotten odor and tarnished copper indicating sulfides.
- All watering activities, including water source, water volume, which plants, and when will be documented daily.

FERTILIZER AND SOIL/MEDIA MANAGEMENT

The Cultivation Director will implement procedures to maintain or improve soil/media organic matter content in a manner that does not contribute to contamination of crops, soil, or water by plant nutrients, pathogenic organisms, heavy metals, or residues of prohibited substances. Soil and media temperatures will be maintained below 95ºF at all times to prevent root rot. The Cultivation Director may utilize any type of media that is safe for cultivation and will consider the following when selecting plant media:

- Cleanliness;
- Saturation rate;

- Uniformity;
- Availability; and
- Cost and cost of nutrient required.

The Cultivation Director may implement fertilization methods appropriate for each crop including hand application, ebb and flow systems, and injection systems. Generally, small fertilizer doses will be applied to crops over a determined period of time to avoid over-feeding and burning of the leaves. The Cultivation Director will only utilize fertilizers that are rated food or pure quality. Nutrient solutions, compost teas, and other substance mixtures applied to plants will be prepared by the Cultivation Manager or a designated, highly trained employee. Each compost purchase or collection will be recorded in the crop management system. Each mixture will be recorded in the system and assigned and labeled with an identification number for application records. The following checklist will be implemented by the Cultivation Director for all fertilizer/nutrients utilized:

- Ensure that only properly trained personnel with appropriate PPE apply crop fertilizers under the direction of the Cultivation Director.
- Never leave spray tanks unattended and ensure they are emptied and stored after each shift.
- Prepare or oversee the preparation of fertilizer solutions.
- Thoroughly clean and decontaminate all mixing areas after each mixing operation.
- Apply fertilizers at a sufficiently early phase in the crop's cycle to allow for an appropriate interval between application and harvest. This practice assures that the fertilizer has fully broken down before the crop is harvested.
- Document any source of information on fertilizer half-life determinations in the crop management system.
- Apply water-soluble foliar fertilizers within twenty-four hours of preparation. Such prompt use may optimize effectiveness of the application and prevent microbial contamination of the solution.
- Ensure that water used for mixing any soluble fertilizer meets all established criteria for agricultural irrigation water.
- Aerate and agitate mixtures in accordance with manufacturer instructions. Pumps will be maintained as necessary and replaced every six months.
- Test all solutions prior to application for pH/TDS/EC prior to each application. Apply fertilizers in a manner that does not contribute to contamination of water.
- Turn off all fans for foliar applications and maintain the ambient temperature in the cultivation area between 59 to 70°F during fertilization operations.
- Clean all equipment and containers used to hold fertilizer solutions using a triple-rinse protocol.
- Apply compost teas and compost materials properly to avoid positive coliform results.
- Cultivation employees who apply compost will be properly trained in safe application to prevent contamination of the plant foliage.

SPRAY AND FEEDING PROTOCOLS

All crop applications will follow established spraying and feeding protocols established by the Director. Current protocols are detailed in the company training guidelines found in the Standard Operating Procedures. Any variance from the published protocols will be recorded in the procedure variance log in the crop management system. Records of published protocols will be maintained for sixty months at a minimum. The protocol will detail for each strain in production:

- 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 (i.e., lights on, HVAC off, and fans off).
- PPE required for application (i.e., mask required, Tyvex suit optional).
- Restrictions preventing application (i.e., do not apply within fthe company's hours of any foliar application).
- Life Cycle Stage restrictions - (i.e., apply in vegetative state only or may be applied in all stages).
- Re-entry intervals.
- Posting requirements.
- Other precautions (i.e. cover medium).

INTEGRATED PEST MANAGEMENT

The goal of Integrated Pest Management ("IPM") is to apply a combination of control methods to prevent, reduce, or maintain pest populations at non-damaging levels. The following items will be considered by the Cultivation Director when developing the IPM program:

- Current status of infestation.
- Regulatory considerations.
- Public perception.
- Pest and crop life-cycle stage.
- Location.
- Size.
- Density.
- Potential to spread.
- Environmental impacts.
- Previous results of measures
- Measurability.

A summary of pest identification, prevention and treatments are explained below.

- Organic pesticides will only be used as a last resort.
- The Cultivation Director will implement and monitor IPM practices to predict potential levels of crop damage, mitigate risk, and control pests.
- Early identification of pest infections is crucial. Each cultivation employee will be trained on and responsible for plant inspection and identification.
- A variety of mechanical, physical, and biological controls will be implemented.

The Cultivation Director may implement the use of appropriate biological controls including predatory wasps and mites and nematodes, lacewings, ladybugs, pirate bugs, and others for preventative or mitigation purposes. The use of biologicals will be limited to recognized and effective applications. The Cultivation Director may implement any practice allowed by the USDA Organic Standards. Regular IPM practices include, but are not limited to:

- Daily monitoring of pest populations;
- Removal of pest habitat, food sources, and breeding areas;
- Utilization of verified "pest-free" supplies;
- Prevention of access to handling facilities;
- Management of environmental factors, such as temperature, light, humidity, atmosphere, and air circulation, to prevent pest reproduction;
- Disposition of infected crops; and
- Evaluation of the cost or prevention in relation to yield and quality improvements.

Pesticides include rodenticides, insecticides, bacteria/fungi (beneficial), herbicides, arachnicides, miticides, molluscicides, nematocides, growth regulators and others. All pesticide applications will be compliant with:

- Federal Insecticide, Fungicide, and Rodenticide Act ("FIFRA");
- Superfund Amendments Reauthorization Act ("SARA");
- Community Right to Know Act ("EPCRA");
- Occupational, Safety and Health Act ("OSHA"); and
- State and local laws including the Florida Agricultural Worker Safety Act ("FAWSA").

Application and storage of pest control products will be in accordance with label recommendations and all regulations. If pesticides, herbicides, insecticides, or fungicides, whether from natural or synthetic sources, are used on a crop, only cultivation employees trained by a third-party as a Certified Applicator will apply these at the labeled minimum effective rates.

DISEASE MANAGEMENT

Acceptable methods of disease management are determined by the Cultivation Director and include, but are not limited to:

- Soil, media, and crop nutrient management practices contained herein.
- Sanitation measures to remove disease vectors and habitat for pest organisms.
- Cultural practices that enhance crop health, including selection of plant species and varieties with regard to suitability to site-specific conditions and resistance to prevalent pests, weeds, and diseases.
- Pest problems controlled through mechanical or physical methods including but not limited to:
    1. Augmentation or introduction of predators or parasites of the pest species;
    2. Development of habitat for natural enemies of pests; and
    3. Controls such as lures, traps, and repellents.
- Disease problems controlled through:
    1. Practices which suppress the spread of disease organisms; or
    2. Application of biological, botanical, or mineral inputs.

CODI COLEMAN – CULTIVATION DIRECTOR

Codi Coleman has years of experience using good handling practices. As a production operator, he is knowledgeable with the Worker Protection Standards (WPS), and Personal Protection Equipment (PPE). He is also highly trained in all sanitation practices regarding cultivation, including disinfecting tools and enforcing wear of disposable gloves and aprons to prevent the spread of any disease.

SAMUEL GLUCKSMAN, DPM - CONSULTANT

Samuel Glucksman, DPM, the crop management specialist and primary account manager at Glades Crop Care, Inc. currently directs all cultivation operations for the East coast and Homestead divisions. He has successfully developed detailed protocols for company operations from diligent field research and good handling practices, providing growers with the best possible business models. Dr. Glucksman is an expert in good handlings practices, and heads the human resources, administrative, and customer service departments at Glades Crop Care, Inc.

JILL LAMOUREUX - ADVISOR

Jill Lamoureux's experience with the American Herbal Products Association's creation of regulatory health and safety standards and her development of the Patient Focus Certification audit standards have made her a national expert on good handling practice applied to cannabis operations. The company will benefit from her accumulation of this knowledge base and will implement many of these practices into the operation.

KRISTOPHER M. PALMER - CONSULTANT

Kristopher Palmer brings strategic focus and advanced judgment gained during a successful career guiding the creation of operational protocols focused on: sanitation, grow medium preparation, and production planning. As a founder and owner of THConsulting in Colorado, Palmer provides exceptional services to the rapidly growing medical cannabis industry. His broad knowledge of state compliance, quality assurance, cultivation facility design, and operational development has given him expertise in the medical cannabis field. Palmer's deep understanding of cannabis cultivation and quality assurance has helped him develop an integrated pest management program for cultivation operations, which is continually updated as new products and information become available. He has engineered cultivation facilities that were designed, maintained, and monitored to restrict pests, disease and deficiencies common for cannabis. In addition, Palmer has developed and integrated operational manuals and pest management protocols that comply with good handling practices, company polices, and procedures. Furthermore, Palmer has developed and implemented company manuals designed to educate and train employees to utilize good handling practices in day-to-day operations. Currently, Palmer is working with Denver Water and the Denver Department of Environmental Health to develop a best practice guide for commercial cannabis cultivation.

GOOD HANDLING PRACTICES

The Cultivation Director, in coordination with the Quality Assurance Officer, will develop, implement, and maintain handling and storage measures that prevent spoilage, molding, and other damage to the crop while preparing it for manufacturing and distribution. The Processing Manager will develop, implement, and maintain processing practices that protect crops from contamination and maintain the quality of the cannabis. Only trained processing employees under the direct supervision of the Cultivation Director or Processing Manager may perform processing operations. The Inventory Manager or designee is responsible for verifying all processing data including batch numbers, yields, waste weight, etc.

Processing refers to the management of the plant throughout harvesting and trimming activities. The Processing Manager will schedule harvests with the Cultivation Manager when the crops are in a condition that will result in a harvest that meets demand and quality requirements:

- Factors including the life-cycle stage of the plants and measured constituent levels (obtained from pre-harvest testing) will be considered, if applicable.
- Harvest operations will take place early in the lighting sequence whenever possible for optimal essential oil preservation.
- All cannabis will be processed in a safe and sanitary manner. Processed cannabis plants will be:
  1. Well cured and free of seeds and stems;
  2. Free of dirt, sand, debris and other foreign matter;
  3. Free of contamination by mold, rot, other fungus, and bacterial diseases;
  4. Prepared and handled on food-grade stainless steel tables; and
  5. Packaged in a secure area under surveillance.

HARVEST AND PROCESSING

All processing operations will be performed in limited access areas with full surveillance camera coverage in accordance with security policies and procedures. During processing operations, crops will be protected from:

- Contaminant or defective equipment;
- Moisture during harvest, handling, and storage to minimize growth of yeasts and molds; and
- Contact with rodents, insects, and other pests to prevent contamination.
- During harvest operations crops will be moved to the trim area as soon as possible after harvest to prevent degradation of the crop. Harvest containers will be maintained at levels so that no compacting of harvested cannabis occurs. Extensive recordkeeping within the BioTrackTHC system is required for all processing activities including harvest and processing. Harvest records, at a minimum, will include:
  1. The quantity of the harvest;
  2. Dates of planting and of harvest;
  3. A precise description of the cultivation site;
  4. The life cycle stage of the crop at the time of harvest;
  5. Relevant crop conditions throughout its cultivation; and
  6. Beginning and ending processing weights of each batch.
- Processing records will be logged in the crop processing log in the crop management system and at a minimum, will include:
  1. The identification of the facility area in which any processing operation was undertaken for each crop including relevant information about pest control plans and cleaning procedures for the area.
  2. A description of equipment used in all processing operations describing the equipment used for each processing operation and information about equipment maintenance. Equipment information will be sufficient to demonstrate the condition of the equipment at each harvest.

3. Relevant information to identify the water source for processing including logs and procedures will be sufficient to demonstrate the water quality at each harvest.
4. A list of each employee working in each processing operation. Relevant information about employees including logs and procedures will be sufficient to also describe the steps that are taken to ensure worker safety and hygiene.
5. Documentation of drying conditions and times; beginning and ending moisture content of each crop; and any additional information relevant to the drying process.
6. Beginning and ending weights of each crop will be maintained in the inventory management system.
7. The inventory records will reflect the specific identification of plants that were harvested for processing operations; the date of operations; the beginning and ending weights of each harvest; with sufficient detail to allow trace-back of any packaged lot to its specific cultivation history.
8. The inventory management system will record transfer and transportation records, with sufficient detail to trace distribution of each crop, if necessary, throughout the chain of custody, from the cultivation facility to the patients(s) who receive(s) any portion of the crop.

- Batch recordkeeping required:
  1. The inventory manager will assign a lot/batch number or other identifying code generated by the inventory management control system to each batch harvested.
  2. Final batches will not weigh more than twenty pounds for weight trim operations and five pounds for dry trim operations.
  3. Batch identification numbers will remain with each harvest throughout processing.

DRYING AND CURING

The Cultivation Director in coordination with the Processing Manager is responsible for implementing and maintaining drying and curing practices that protect crops from contamination and maintain the quality of the cannabis. Drying/curing areas are restricted to the Chief Executive Officer, Cultivation Director, and Processing Manager.

- All drying/curing operations will be performed in limited access areas with full surveillance camera coverage in accordance with security policies and procedures.
- Drying/curing areas will be maintained to ensure that there is sufficient ventilation for airborne moisture to escape providing adequate air circulation throughout the drying area and sufficient odor mitigation.
- Harvested material will be placed on clean food-grade surfaces that afford adequate air circulation.
- If heaters or other sources of artificially generated heat are used in the drying operation, adequate ventilation of the heating equipment will be provided and only fuels that will not result in hazardous combustion emissions coming into contact with the crop and thereby contaminating the material will be utilized.
- If using mechanical drying equipment, such as belt, drum, rotary, or oven-tray dryers, all manufacturer instructions and established operating procedures will be followed to ensure that quality of the plant material is maintained.

PACKAGING, LABELING, AND STORAGE

The Cultivation Director, in coordination with the Processing Manager, will develop, implement, and maintain packaging, labeling, and storage practices that prevent crop contamination, protect the quality of the cannabis, and properly identify all batches. The Processing Manager will accurately identify and label all cannabis transferred to bulk storage containers. Packaging of bulk cannabis will be in food safe bags or containers approved by the Cultivation Director. Labeling and packaging will be selected to ensure shelf stability and comply with all company standards including child resistant packaging.

Storage areas are restricted to the Chief Executive Officer, Cultivation Director, and the Processing Manager. The Cultivation Director will approve and witness the transfer of cannabis from the drying/curing area to storage. Storage areas will have full surveillance camera coverage in accordance with security policies and procedures. Bulk packaged crops are to be stored in cool, dry areas away from direct sunlight and exterior walls and off the ground in containers that protect against excessive exposure to air, light, and moisture. Crops will not be stored in the same area with any non-crop items (i.e. cleaning supplies, nutrients, etc.). The Cultivation Director will verify the weights of all harvested crop prior to storage. Packaging and labeling of bulk stored cannabis for distribution to the manufacturing unit will take place under camera surveillance.

SUSAN BAUMGARTNER, PHARMD, MBA – CHIEF OPERATING OFFICER

Dr. Baumgartner has managed adverse event reporting and recalls related to pharmaceutical products in compliance with FDA reporting requirements. Her experience in quality assurance and compliance will help the company manage product risk and reduce product liability. Dr. Baumgartner's in-depth knowledge with respect to cannabis, pharmacy practice, medication use, and routes of administration will ensure effective and successful patient interactions. Her experience designing and implementing successful and compliant training programs for employees, including managers, individual contributors, and cross-functional teams, will assist the company in selecting and managing a skilled and professional workforce.

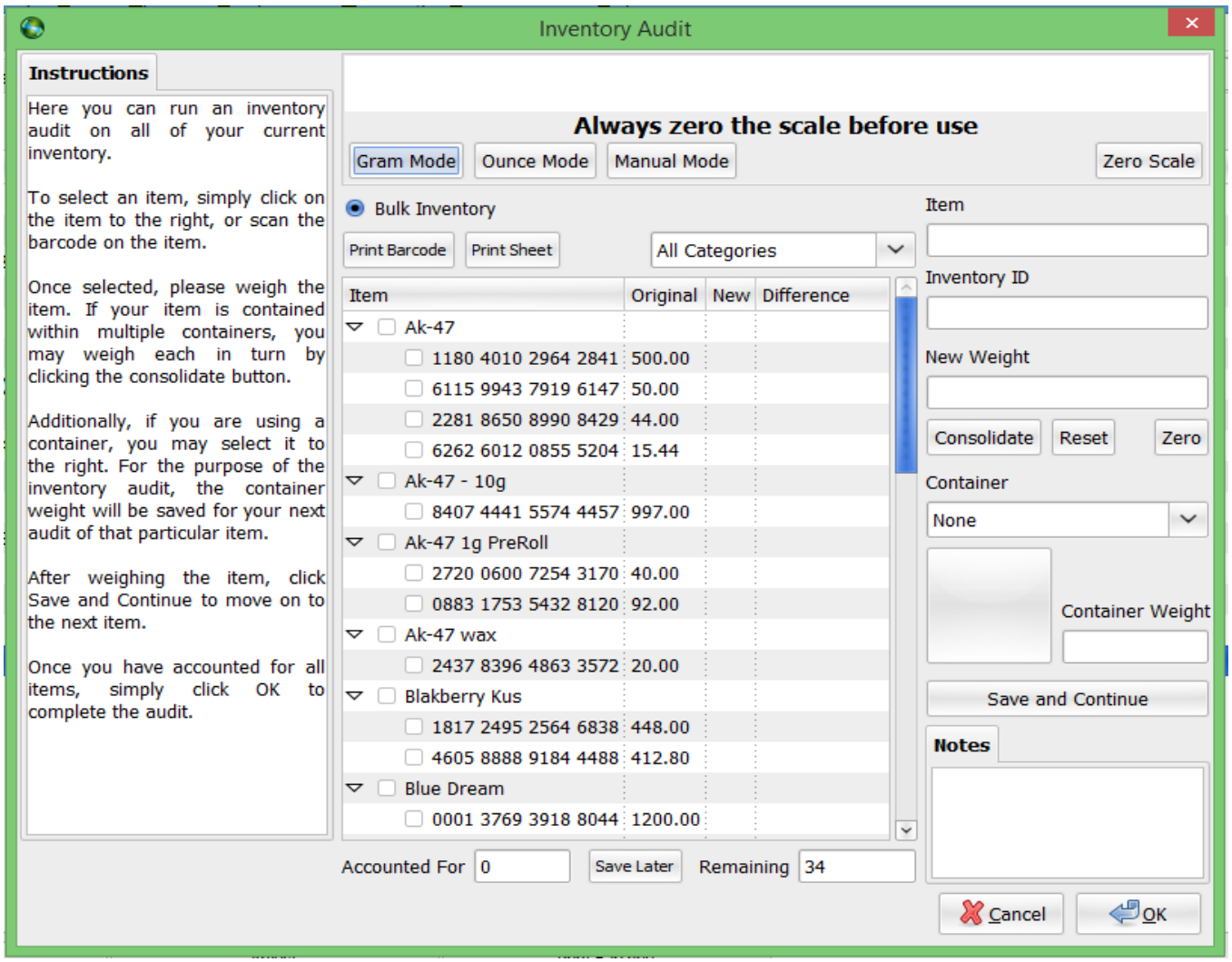
Susan Baumgartner shall apply her knowledge and research of plant science, pharmacology, and therapeutic agents to provide the company with strategic direction and oversight of medical product development. Susan Baumgartner is a Doctor of Pharmacy and Master of Business Administration; both degrees were earned with the highest honors. Dr. Baumgartner has extensive experience in accelerating the growth of startup companies. She managed regulatory submissions to the FDA, and served as primary liaison with FDA for clearance of an in vitro diagnostic device and ingestible adherence marker (i.e., food additive) for use in solid oral dosage forms.

Dr. Baumgartner has experience in negotiating collaborative development deals and establishing strategic alliances, including partnerships with pharmaceutical companies and contract development and manufacturing organizations (CDMOs), including Catalent. She has completed HIPAA training and possesses significant experience handling confidential information. Furthermore, Dr. Baumgartner has significant experience designing and implementing successful and compliant training programs for employees, including: managers, individual contributors, and cross-functional teams. Her experience gathering and managing data, including prescription drug utilization data, clinical trial data, and research summaries will assist the company's efforts to provide pharmaceutical grade cannabis products.

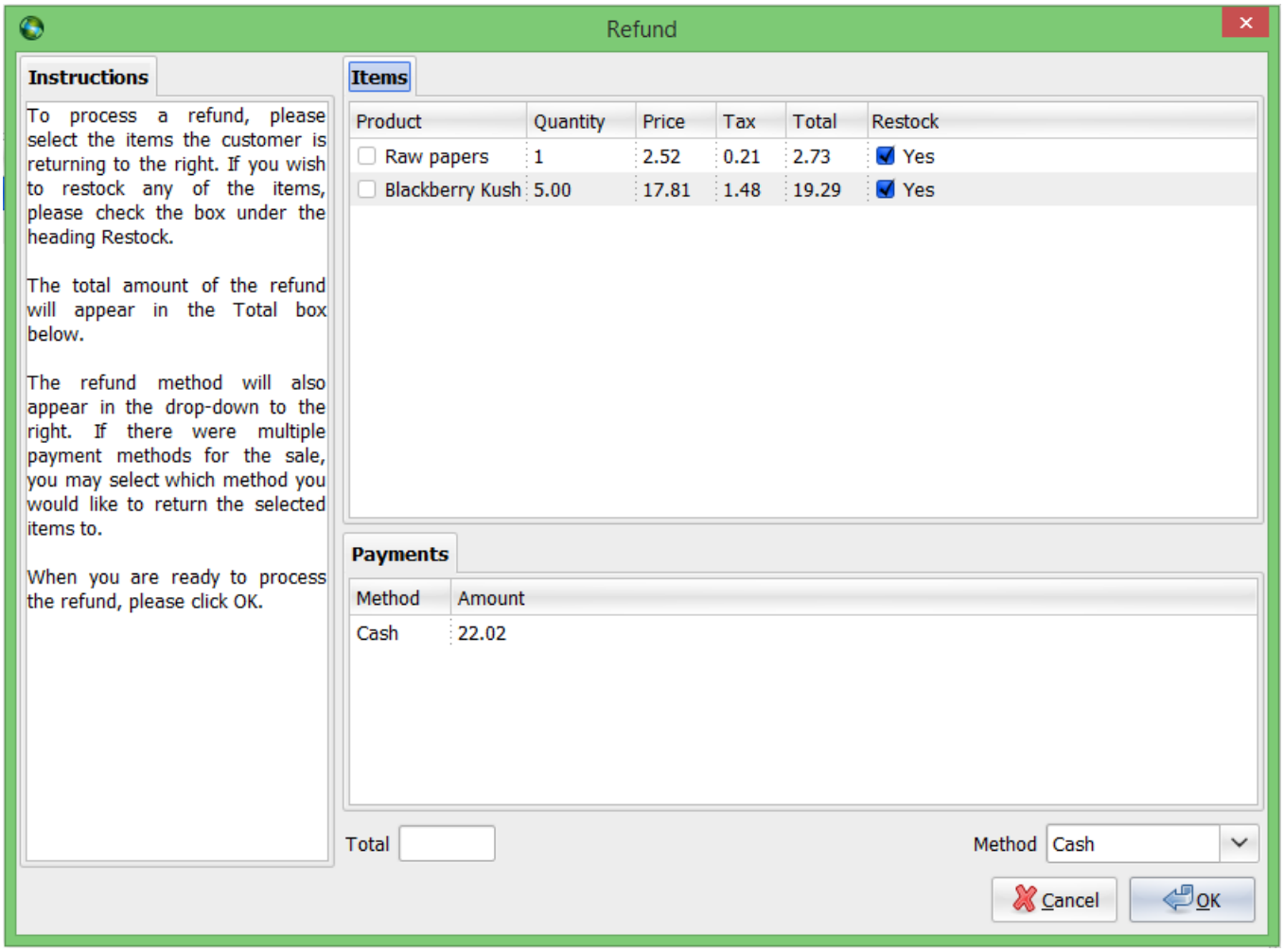
Dr. Baumgartner has professional training as a pharmacist and experience interacting with patients, dispensing therapeutic products for individual ailments, and developing patient education programs. Her past experiences in the pharmaceutical industry provide the company with expert knowledge of drug development, clinical trials, and observational studies done with pharmaceutical products. She also brings a deep knowledge of medicinal cannabis with respect to routes of administration. Dr. Baumgartner's proficiency in pharmacology and pharmaceutical products will aid the company in providing the most effective delivery systems for its patients, including efficient formulation of the therapeutic cannabinoid, CBD, and development of a controlled release capsule.

BIOTRACKTHC

BioTrackTHC enables the business to collect, store, and retrieve all data and activity. All inventory records, patient records, recall reports, sales/transaction records, product disposal records, and all scanned documents can be accessed at any time (real time), either in-system or through the report creation tool. Though system actions can be adjusted or voided, at no time is any data ever fully deleted as BioTrackTHC maintains a log of every action, including adjustments and voids, so that the entire history of the system may be reconstructed. The availability and report ability of the system data enables the said entity to produce any information necessary for the OCU during an inspection or at their request. The Plant/Inventory Historical Report has the ability to trace the source plants for a given product, any flower or byproducts created from those plants as well as any wholesale or retail sale with the contact information for each person it was sold to. This report tracks every gram contained in a batch, including but not limited to all products derived from the plant, the contact information for the purchaser, and all vendor information and transport logs.



In the event of a recall, permitted users can quickly pull reports of all products and transactions associated with a specific plant(s), batch or strain. Within the system the licensed entity will be able to quickly and easily find the remaining product, the locations (i.e. patients) delivered to as well as all sources and derivatives of the product. Once the affected individuals have been identified, because the individual contact preferences have already been logged, timely communication is accessible. BioTrackTHC also provides a method of sending SMS(text) message or emails, which can even be targeted to just the patients who've purchased a specific product within a given time period, (all at no cost or SMS usage rates to the patients).


Refund
Instructions
To process a refund, please select the items the customer is returning to the right. If you wish to restock any of the items, please check the box under the heading Restock.
The total amount of the refund will appear in the Total box below.
The refund method will also appear in the drop-down to the right. If there were multiple payment methods for the sale, you may select which method you would like to return the selected items to.
When you are ready to process the refund, please click OK.
Items
Product | Quantity | Price | Tax | Total | Restock
Raw papers | 1 | 2.52 | 0.21 | 2.73 | Yes
Blackberry Kush | 5.00 | 17.81 | 1.48 | 19.29 | Yes
Payments
Method | Amount
Cash | 22.02
Total
Method Cash
Cancel
OK

Part 3.A.1.n. Any awards, recognition or certifications received for relevant expertise.

CODI COLEMAN – CULTIVATION DIRECTOR

Codi Coleman has been certified for attending and completing multiple cultivation courses at Oaksterdam University in California. He completed these courses at the top of his class.

SAMUEL GLUCKSMAN, DPM - CONSULTANT

- Executive of the Year; Covington Who's Who in Professionals, 2014
- Featured Profile for all of Florida's Agriculture; Covington Who's Who in Professionals, 2014
- Emerging Leadership Development Program; Florida Fruit and Vegetable Association, 2013 – Present
- Graduate Assistantship in the Plant Medicine Program Clinical Trials, 2008 – 2010
- Graduate Assistantship in the University of Florida Plant Disease Clinic, 2010 – Present
- American Phytopathological Society Travel Award, 2010
- Third Place 2010 Soil & Crop Science Society of Florida Graduate Student Paper Contest
- James H. Morris Memorial Scholarship, Community Foundation, May 8, 2008
- Florida Bright Futures Scholarship, 2003 – 2007
- National Society of Collegiate Scholars, April 13, 2005
- Member, National Alliance of Independent Crop Consultants-Government Affairs-Research Subcommittee, 2015-Present
- VIP Member, Who's Who in Professionals, 2014 (for life)
- Member, Florida Fruit and Vegetable Association, 2013 – Present
- Member, Florida Fruit and Vegetable Association Emerging Leadership Development Program, 2013
- Member, American Phytopathological Society, 2008 – Present
- Member, Doctor of Plant Medicine Student Organization, 2007 – 2011
- President, Doctor of Plant Medicine Student Organization, 2008
- Treasurer, Doctor of Plant Medicine Student Organization, 2007
- Member, National Alliance of Independent Crop Consultants, 2007 – Present
- Member, Alpha Zeta Honors Fraternity (Florida Chapter), 2004 – 2007
- Candidate, University of Florida Student Government Senate, 2006
- Banquet Committee Chair, Alpha Zeta Honors Fraternity, 2005

SUSAN BAUMGARTNER, PHARMD – CHIEF OPERATING OFFICER

Susan Baumgartner is a Doctor of Pharmacy and Master of Business Administration; both degrees were earned with the highest honors. She has completed HIPAA training and possesses significant experience handling confidential information.

- Key member of Executive Management Team and Board of Directors for a startup company in Alachua County that licensed patient monitoring technologies from the University of Florida.
- Vice President's Distinguished Service Award and Marketer of the Year Award at Merck
- Perry A. Foote Award for Distinguished Scholarship (Top Graduate in the Doctor of Pharmacy Program)
- American Pharmaceutical Association – Academy of Students of Pharmacy Mortar and Pestle Professionalism Award
- Beta Gamma Sigma Business Honor Society
- Member, National Advisory Board for University of Florida College of Pharmacy (2008 – 2009)
- University of Florida Outstanding Young Alumni Award (2007)

JILL LAMOUREUX - ADVISOR

The company's operations advisor, Jill Lamoureux, has been recognized as national leader in the medical cannabis industry for many years. She serves as an independent advisor to municipalities, state legislators, regulators, and private companies. Her operations served as a model across the country and excelled in patient education and services. Westword Magazine featured her dispensary in Boulder, Colorado as a clean, hospitable environment staffed by genuinely nice people; "I was as impressed by the professional atmosphere and friendly nature of the staff as I was by the potency of the cannabis. This dispensary takes a measured approach to [operations], tempering a wide selection of [medical] high-grade with a huge dose of patient education and wellness services."

- American Herbal Products Association Cannabis Committee, 2013-Current
- ASA Foundation Executive Cannabis Audit Committee, 2013-Current
- BOTEC Analysis Corporation Subject Matter Expert, 2013-Current
- National Cannabis Industry Association, Chair, 2010-2012
- City of Denver Medical Cannabis Workgroup, 2011-2012
- Colorado Department of Revenue Medical Cannabis Rulemaking Workgroup, 2009-2012
- Colorado Department of Health and Public Environment Medical Cannabis Workgroup, 2009-2010

KRISTOPHER M. PALMER - CONSULTANT

Kristopher Palmer is a Nationally Certified Thermographer, certified by the Infrared Training Center. This has allowed him to apply thermal imaging to cultivation operations to improve garden and building efficiencies.

2. INFRASTRUCTURE

Part 3.A.2.a Vehicles that will be used to transport product among cultivating, processing, and dispensing facilities

Chestnut Hill Tree Farm has selected to purchase two Toyota Prius vehicle with customized climate controlled cargo areas and RFID secured storage. Vehicle security is managed through several tools that communicate directly with the facility and Director of Security including Teletrac GPS fleet tracking services.

Transportation manifests are also featured in the BioTrackTHC system to monitor turn-by-turn directions and provide an estimated route time. The entire logistics process is tracked, permitting the surveillance of every order from door to door. The transporter establishes a set route that can be viewed by authorized users. Way-points can be generated just in case the transporter places an audit on the shipment midway through the transport.

Transportation manifests are featured in the system to monitor turn-by-turn directions and provide an estimated route time. The entire logistics process is tracked, permitting the surveillance of every order from door to door. The transporter establishes a set route that can be viewed by authorized users. Way-points can be generated just in case the transporter places an audit on the shipment midway through the transport. Transport documentation provides the following:

- Employee identity and badge number
- Vehicle VIN number
- Time stamped batch/lot number
- Total quantity being transported

The manifests provided also contain signature lines creating another level of accountability confirming proper receipt has occurred. This information can be maintained, verified and scanned directly into the BioTrackTHC system for clerical preservation. The manifest is archived within the system and can be quickly made available upon request by the OCU or law enforcement.

COMMUNICATIONS NETWORKS AND HARDWARE

Chestnut Hill Tree Farm currently utilizes the following communications software:

- ESI 50 LITE Communication Server and Phones 2 wire digital Phone System, maintained by Florida Phone Systems.
- Hi Speed DSL from Windstream Communications
- Cell phones to communicate through AT&T

The systems and hardware described above serve as the infrastructure for the company's communication systems. These systems will be maintained regularly. Additionally, the company's policies and procedures provide direction for company operations when critical information systems go down. The BioTrackTHC point of sale system is server based and is developed to automatically update when communication systems come back on line. Cells phones and landlines provide redundancy for voice communications.

BIOTRACKTHC

BioTrackTHC has text messaging and email capabilities within the system. This allows managers and employees to communicate with one another without having to open another program or use their cellphones. A manager can send a task list to an employee that is viewable on the same screen where they are inputting data or performing any function within the system.

INTER-COMPANY COMMUNICATIONS

Chestnut Hill Tree Farm has also adopted protocols for internal communications. Due to the highly regulated nature of the company's operation, the quick and effective dissemination of information to employees is critical. Efficient communication is necessary for compliant and efficient operations. Effective internal communication promotes a culture that values employees and enables the company to achieve its strategic goals. The company's internal communications plan addresses the channels used to communicate with internal stakeholders. While the company seeks to foster a culture of inclusion in information sharing, dialogue and decision-making, it should be noted that there may be decisions made at the executive level that cannot, by their nature, be the subject of institution-wide consensus. The protection of private information related to patients and corporate trade secrets is a top priority for management.

In addition to direct means of communication (person-to-person and telephone), the company provides and expects all employees to use and to be aware of the information distributed via the primary means of inter-company communication:

- Electronic mail and calendar
- Voice mail
- Intranet

Official company communication may be sent by any of these above means. All employees are expected, on a regular basis, to accept their mail communication within a reasonable time period from the date of receipt. Employees should also make it known to their supervisor when a communication is not understood; and suggest when and how information could have been communicated more effectively.

OBJECTIVES

- To ensure effective one-way dissemination of information to employees.
- To take advantage of opportunities for dialogue with employees and upward communication.

ONE-WAY COMMUNICATION

The company seeks to provide free and open access for employees to sufficient, consistent, and timely information regarding internal plans and actions so that they are well informed and able to work effectively and in compliance with regulations and company policies and procedures. The company will implement the following one-way communication methods:

- Every employee receives a copy of the company's strategic plan, which includes the organization's mission, vision, values statement, strategic goals and strategies about how those goals will be reached.
- Every employee receives an employee handbook that contains all up-to-date personnel policies.
- Every employee has access to standard operating procedures for their operating unit.
- Every employee receives a copy of their job description and the organizational chart.
- Executive management meetings for director and unit will be held bi-weekly. The company is comprised of the following units: executive management, security, accounting and finance, cultivation and processing, manufacturing, and dispensing.
- Unit meetings will be held by managers weekly.
- All company meetings will be held quarterly.
- Managers must have face-to-face contact with employees in their department at least once a week.
- Meetings will be held to recognize major milestone and accomplishments.
- All employees receive yearly performance reviews, including their goals for the year, updated job descriptions, accomplishments, needs for improvement, and plans to help the employee accomplish the improvements.

Strategy and Methods
Chestnut Hill Tree Farm will disseminate information utilizing the organizational hierarchy.

1. Face to Face Communication in Organizational Unit Meetings

As appropriate, information and issues discussed in executive management meetings is cascaded though the organization starting with weekly staff meetings conducted by executive managers in their respective units. Directors and all other managers who have staff reports have responsibility for sharing/passing along information intended to be disseminated institution-wide in a timely manner. At the end of each executive bi-weekly management meeting, the Chief Executive Officer identifies the agenda items/information that should be communicated throughout the company and directors and managers are then responsible for initiating the information dissemination process.

2. Company Wide Meetings

The Chief Executive Officer will conduct an all company meeting quarterly or as is otherwise deemed necessary. These meetings are intended to convey timely information about organizational issues and/or give the Chief Executive Officer the opportunity to make a "state-of-the-company" address to employees.

Strategy and Methods
The company will disseminate information utilizing internal mass media.

1. Company Intranet

Chestnut Hill Tree Farm will develop and maintain an internal website for company communication. This intranet will assist in the maintenance and organization of company documents including handbooks, forms, operating manuals, and reference links. The purpose of the intranet is to inform employees of the company's business, policies, news, and events, and provide information that helps employees fulfill the company's vision, mission, core values, and strategic directions. Employees are responsible for logging into the intranet and reviewing new postings on a regular basis.

Oversight**:**
The intranet is managed by the Human Resources Manager and the Information Technology Manager.

Circulation:
The intranet is accessible only by employees with a valid login.

Frequency:
The intranet is accessible at any time by employees with a valid login. The content will be updated as frequently as needed. Every employee with a valid login will receive an email notice of updated material. Depending on the nature of the update, particularly for legal or compliance issues, the posting may require an acknowledgement from the employee that they have reviewed and understand the update.

Content:
Content is subject to editorial discretion in determining what is of interest to the company. Political, religious, or controversial topics are prohibited. All items are provided by managers and subject to editing for reasons of clarity and space. The intranet will provide current copies of all manuals, forms, training videos, and other documents needed for employees to perform their duties. Additionally, blog content will include:

- CEO Notes: provides information from the weekly executive leadership meeting and other news from the Chief Executive Officer.
- Operational Notes: provides information provided by operating units about their news, policy and procedure changes, services, deadlines, etc.
- Medical Cannabis Notes: provides information that educates employees about medical cannabis science, policy, or other issues surrounding medical cannabis.
- Technical Notes: provides employees with reminders or hints for the information technologies used in the company. For example, providing a short cut in the point of sales system.
- Personal Notes: offers personal news about employees or patients and their successes and achievements, both personally and professionally. Due to issues of privacy all information shared must be submitted or approved by the employee or patient.

Submission Instructions:
Content may be submitted via e-mail at any time to the Human Resources Manager. Submissions should include the contributor's name, department, e-mail or phone. Items will be attributed to the contributor unless other attribution is indicated. Publication cannot be guaranteed.

2. All Company E-Mail

The intranet is the preferred method of intercompany communication. Decision to send an all-company e-mail rather than publishing on the intranet is based on whether or not the information that needs to be disseminated is time-sensitive or needs focused attention. Employees who have information that is believed to require institution-wide dissemination and meets either criterion should contact their immediate supervisors to obtain approval for as well as facilitate the sending of an all-company e-mail message. Only managers may send all-company emails unless the email is in regards to an incident response issue in accordance with the company's incident response policies. A list of time-sensitive events includes but is not necessarily limited to the following:

- Deaths
- Inspection or visit notices
- Crisis communication and emergency closings
- IT notices about viruses or imminent problems
- Power/service outages or interruptions
- Public safety advisories
- Parking or construction issues
- Chief Executive Officer messages

3. Broadcast Voice Mail

The Chief Executive Officer has the authority and access to generate a voice mail message to all-users simultaneously. It is at the CEO's discretion as to when and under what circumstances this medium is used. Broadcast voice mail will be utilized for emergency and incident communications.

UPWARD COMMUNICATION

Chestnut Hill Tree Farm will take advantage of and create new opportunities for dialogue with employees and upward communication. The highly regulated structure of the company requires that employees feel comfortable bringing problems, issues, and concerns up the chain of authority. The company will implement the following upward communication methods:

- All employees give regular status reports to their supervisors. The informal email report includes a list of their activities in the past week, their plan for the following week, and a report of any actions, problems, or issues to address.

- All supervisors will meet one-on-one at least once a week with their employees to discuss current operations, acknowledge any concerns from the employee, etc.
- Executive management and staff meetings will provide opportunity to provide feedback. A round table approach to hear from each person will be utilized to solicit participation.
- All feedback will receive a management response, even if only to say no action will be taken on the reported problem or suggestion, etc. and the reason why.
- “Grapevine” communication is one of the most prevalent and reliable forms of communications and will not be discouraged unless it negatively impacts morale. Major "movements" in the organization usually first appear when employees feel it safe to venture their feelings or opinions to peers.

Strategy and Methods

Chestnut Hill Tree Farm will formalize institutional opportunities for dialogue and upward communication.

1. Review, Recommendation, Feedback/Consensus Process

While for legal and compliance reasons there are some decisions that must be made unilaterally by the executive management team, the company values decision-making at all levels and places an importance on involving affected employees in the decision-making process when possible and appropriate. The review, recommendation, feedback, consensus process for seeking company input is as follows:

- Policies, regulations, processes or issues that may have a company-wide impact are discussed as an agenda item at a regular meeting of the executive management team.
- An item is placed on the agenda by the Chief Executive Officer or at the request of another executive management team member.
- If the agenda item is determined to have a company-wide impact and broad-based company input is appropriate, the executive management team assigns it for review and recommendation to a group of managers selected by the CEO.
- The manager group will seek feedback from their operating unit’s employees and make a recommendation to the executive management team.
- After the executive management team reviews the document or recommendation, either consensus is reached and the document or recommendation is approved or the document is returned to the manager group for further consideration.
- The cycle begins again until consensus is reached.

Employees may request that an item be placed on the executive management team meeting agenda. This request should be made to and carried forward by the immediate supervisor. Should a determination be made by the Chief Executive Officer that the issue will not be placed on the executive management team agenda, the supervisor will apprise the employee as to the rationale.

2. Communication Liaison

In an effort to ensure that every employee has the opportunity to bring ideas and issues of concern to the attention of the executive management team, each operating unit’s manager will serve as communication liaisons between staff and the Chief Executive Officer. The communication liaison’s primary responsibility is to bring ideas, issues and concerns to the CEO on behalf of individual employees.

While members of the executive management team maintain an open door policy and the communication liaison provides employee access to the CEO, employees with issues and concerns are encouraged first to pursue standard administrative channels.

3. Company Forums and Focus Groups

When there is detailed information about an issue that needs to be presented company-wide and requires the opportunity for questions and input, a forum format may be utilized. From time to time the company will seek input from employees about various aspects of the organization. Focus groups consisting of 5 to 10 employees are facilitated by company directors or an outside facilitator.

METHODS FOR ASSESSING AND MITIGATING ODOR IMPACTS

Each operating day the Facilities Manager or designee will evaluate on-site odors and operations for potential release of objectionable odors. The greenhouse is fully equipped with Ecosorb filters to prevent cultivation and processing odors. If questionable or objectionable on-site odors are detected by management, the company will implement the following protocols:

- Investigate and determine the likely source of the odor.
- Access the effectiveness of available on-site management practices to resolve the odor event and immediately take steps to reduce the odor-generating capacity of on-site material.
- Determine if the odor traveled off-site by surveying the site perimeter and noting existing wind patterns.
- If it is determined possible odors impacts occurred, appropriate EA and/or neighbors contact is made.
- Record the event for further operational review.

METEOROLOGICAL CONDITIONS

The Chief Operating Officer will document historical data regarding wind velocity and direction taking into account seasonal shifts. This information will serve as a guideline for periods of heightened awareness or periods when more attentive order mitigation is required.

COMPLAINT RESPONSE PROTOCOL

All complaints received by the company will be categorized by a manager. Odor complaints will be directed to the Facilities Manager or Chief Operating Officer. The Facilities Manager or Chief Operating Officer must respond to any complainant relating to any odor issue within twenty-four hours. If the responding manager cannot fully resolve the issue, the Chief Executive Officer must be notified and determine the appropriate course of action. It is company policy to make a good faith effort to resolve any complaint, whether legitimate or frivolous whenever possible and in a timely manner.

OPERATING PROCEDURES (AND DESIGN CONCERNS) TO MINIMIZE ODORS

In order to minimize the development of conditions that could lead to odor problems, the compostable material handling areas of the site will be designed based on the nature and quantity of materials to be received and stored, climatological factors, adjacent land use, grading, and drainage controls.

Compost Management

The primary source of odors at this site occur from additions to compost during crop harvest and processing. Employees will be trained to manage all compostable material handling in a manner that minimizes the development of conditions that could lead to objectionable odors. Composting can be affected by many factors, but the four key factors that will be controlled by the Facilities Manager to reduce odor and more easily to promote aerobic conditions and reduce odors are:

- Nutrient balance
- Temperature
- Moisture content
- Aeration (Particle / pile size)

During operational times when large quantities of cannabis waste are added to the compost site, the company may include additional of odor neutralizing materials including enzymatic catalysts that can be used to degrade odorous

compounds. These are normally applied to the surface of the compost windrow or sprayed in the airspace above it. Their effectiveness will be verified by the Chief Operating Officer. Also, oxidizing chemicals such as hydrogen peroxide and potassium permanganate can be used to chemically oxidize anaerobic odors. These chemicals can be effective if incorporated evenly in the windrows and in low concentrations to prevent accidental kill of the aerobic microorganisms.

The Facilities Manager will monitor and adjust the following factors in the compost mix:

- Nutrient balance is determined primarily by the C:N ratio in the compost mix. The typical ratio is 30 parts carbon to 1 part nitrogen.
- Temperatures in compost windrows should range from 40EF to 140EF. At temperatures higher than 140EF, most aerobic microorganisms die and anaerobic decomposition takes place. Therefore, composting proceeds at a slower rate at excessively high temperatures.
- Moisture content in the composting mix ideally should be 55-60%. At high moisture conditions, liquids fill the porous spaces (free air pockets) in the compost piles, thus preventing the flow of air. Under these conditions, oxygen required for aerobic decomposition is very limited and rapidly depleted, resulting in anaerobic decomposition.
- Aeration is required as even at normally acceptable moisture contents, anaerobic conditions are likely if compaction or small particle sizes lead to inadequate free space for air flow (porosity).

AIRBORNE EMISSION CONTROLS

In order to reduce airborne emissions of odors, the company will utilize standard carbon filters in the greenhouse facilities. Portable carbon scrubbers will also be used in the harvest and processing areas to reduce the temporary odors caused from those operations. Additionally, exhaust air will be treated with Ecosorb® natural organic odor neutralizer[1] during the flowering phase in the cultivation areas.

PAD AND FILTER MAINTENANCE

Regular pad and filter cleaning and maintenance is required by the company's maintenance policies and will decrease the accumulation of any odor causing build up.

[1] http://odormanagement.com/

3. PREMISES, RESOURCES, AND PERSONNEL

Part 3.A.3.a. Location of all properties Applicant proposes to utilize to cultivate low-THC cannabis, including ownership information for the properties and any lease terms if applicable

i. For any property that is leased by the Applicant, include documentation that the property owner consents to the use of the property for the purposes of cultivation of low-THC cannabis and documentation that the mortgagor or lienholder has been given notice of the use of the property for the purpose of cultivation of low-THC cannabis; and

ii. For any property owned by the Applicant but subject to a mortgage or lien, include documentation that the mortgagor or lienholder has been notified of the use of the property for the purpose of cultivation of low-THC cannabis.

The property at 15105 NW 94th Ave, Alachua, FL 32615 is owned by the Applicant. Mortgagor approval is attached.

Fwd: Medical Marijuana license

Mon, Jul 6, 2015 at 1:42 PM

---------- Forwarded message ----------
From: Robert Wallace <chnuts@gmail.com>
Date: Mon, Jul 6, 2015 at 3:19 PM
Subject: Fwd: Medical Marijuana license
To: Jill Lamoureux <jillklamoureux@gmail.com>

Bob

R.D. Wallace
Chestnut Hill
15105 NW 94 Ave
Alachua, FL 32615
352-219-5825

---------- Forwarded message ----------
From: Mark Wellner <mwellner@floridacitizensbank.com>
Date: Tue, Feb 24, 2015 at 11:01 AM
Subject: Re: Medical Marijuana license
To: Robert Wallace <chnuts@gmail.com>

Bob,

We don't have a problem maintaining the LOC as is with Chestnut Hill Tree Farm.

Good luck with your application.

Let me know when you hear the answer.

Mark Wellner
Vice President
Senior Credit Officer
Florida Citizens Bank
3919 West Newberry Road
Gainesville, FL 32607
NMLS: 689202
Phone: 352-333-6547
Fax : 352-378-1836

Part 3.A.3.b. Compliance with local regulations regarding sanitation and waste disposal

Chestnut Hill Tree Farm's waste management policies detail the operational procedures for cannabis waste disposal. The Cultivation Director, in collaboration with the Chief Operating Officer and Facilities Manager, is assigned responsibility for enforcing policies and procedures relating to cannabis waste management in the cultivation unit. Pursuant to Section 64-4.002 Part (c), all waste, including waste composed of or containing finished cannabis and cannabis products, will be stored, secured, and managed in accordance with applicable state and local statutes, ordinances, and regulations. The company's waste disposal procedures are detailed in the Standard Operating Procedures which are included as an Appendices to the application.

All disposed waste will be recorded in the waste disposal log with details pertaining to the date of disposal, type and quantity of waste disposed of, manner of disposal, and the name of the patient who supplied the waste if applicable. Additional waste disposal provisions include detailed plans for excess product disposal, liquid and solid waste disposal based on guidelines from environmental agencies, composting practices, and the disposal of expired, contaminated, or otherwise unusable cannabis products.

All managers are responsible for ensuring the quality and safety of cannabis products in their inventory on a daily basis. Each operational unit must ensure that expired, contaminated, or otherwise unusable cannabis products are returned to the cultivation facility for disposal in accordance with the company's waste management policies and properly recorded in the inventory management or point of sale systems.

As the company shall produce oil extractions only, production will be utilized as much viable cannabis as possible, reducing excess medical cannabis waste from operations. The company's current waste management plan operates with three streams of waste: compost, laboratory waste, and medical waste. Laboratory waste consists of chemical waste, sanitizers, solvents, and any other waste from extraction operations. Medical waste shall consist of any finished Derivative product that has been deemed as waste by an appropriate supervisor, and will be then be hauled by the same hazardous waste company that will also dispose of all laboratory waste. All waste from dispensary operations will be transported to the cultivation facility in compliance to local and State laws and regulations, Federal Laws, and company policy. The company has found a compliant waste management organization that specializes in the disposal of hazardous waste. The local ordinances that address solid and liquid waste are discussed in this section. The company's proposed waste management polices do not conflict with local ordinances in anyway, however, should they in the future, the company will adapt all policies and procedures to comply. The company's protocols for waste management are further addressed within the odor mitigation and cultivation plans.

Pursuant to Alachua County's regulations regarding wastewater, the minimal, if any, disposal of wastewater shall be accomplished by environmentally sound procedures consistent with Florida Department of Environmental Protection regulations and Article XII Section 406.70. The company shall adhere to all local wastewater disposal standards and record and maintain all necessary information regarding wastewater in the waste disposal log. Unlike hydroponic systems, the company's soil base media does not result in any liquid waste runoff. Local ordinances, which are not applicable to the company at this time due to company's operational procedures, include:

- Section 406.70 Part (b) – Discharges to surface waters and wetlands
- Section 406.70 (d) – Spray irrigation

In accordance with Article II, Section 75.303 of Alachua County's local ordinances, the company will comply with the country's preferred methods of waste disposal, recordkeeping requirements, and all Federal, State, and local laws for all types of waste produced during cultivation operations. The company has found an established and authorized waste management company that can properly dispose of all of the company's processing and

laboratory waste [website found at: http://www.hazardouswasteexperts.com]. Pursuant to company policy and industry best practices, all cultivation department waste will be stored and disposed of in a manner that:

- Minimizes the development of odors;
- Minimizes the potential for waste to attract, harbor, or become a breeding place for pests;
- Protects against contamination of cannabis, contact surfaces, water supplies, and grounds surrounding the facility;
- Controls hazardous waste to prevent contamination of cannabis, contact surfaces, water supplies, and grounds surrounding the facility;
- Prevents diversion, theft, or loss of unusable cannabis product;
- Provides traceability through documentation, reporting, and electronic tracking.

The company has decided to dispose of cannabis waste through grinding and composting techniques that are compliant to all local, State, and Federal laws and regulations. The company's cultivation facility's composting of solid cannabis waste, the cultivation facility shall essentially produce zero solid waste. Prior to commencing the following disposal process, the appropriate cultivation manager will assure that all pre-disposal reporting and recordkeeping requirements are satisfied. A trained cultivation employee, under management supervision, will render solid cannabis waste unusable by grinding and incorporating cannabis waste with other locally approved ground materials. Cannabis plant waste will be ground with either compostable mixed waste, which includes food waste, yard waste, vegetable based grease or oils, or other Florida Department of Environmental Protection–approved compostable waste materials.

Per Article II of Alachua County's regulations, the company shall properly dispose of all solid waste in accordance to the county's policies. In accordance with Section 75.302, the company shall comply with all collection service and recycling requirements for the establishment. All facility department waste will be collected and disposed of such that:

- The facility shall provide for the "source-separation" of the designated recyclable materials from its solid waste.
- The company will provide for the source-separation of any metals and packaging materials.
- The company shall provide for the proper recycling of such recyclable material at a materials processing facility either by entering into an agreement with a permit holder or certified recycler, or by other lawful means.
- The facility manager shall ensure that all recovered materials shall be placed in a recycling container to minimize contaminating the recovered materials with solid waste so that no more than twenty-five percent of the weight or volume in the recycling container is solid waste.
- The company has established a recycling program that is convenient and accessible to all employees for recycling of designated recyclable materials.
- The facility manager will ensure all recycling containers in a safe, accessible location.
- The facility manager will be responsible for the proper maintenance for all recycling containers.

Part 3.A.3.c. The ability to obtain zoning approval

Chestnut Hill Tree Farm resides in Alachua County. The County has determined that cultivation, processing, and dispensing are allowed uses in the County as evidenced by this memo issued March, 5 2015.

ALACHUA COUNTY
DEPARTMENT OF GROWTH MANAGEMENT
OFFICE OF PLANNING AND DEVELOPMENT

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Comprehensive Planning

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Principal Planner
Development Services

Tom Webster
Housing Program Manager

Brenda Wheeler
Development Review Manager

Jeffrey Hays, AICP
Transportation Planning Manager

Gregory A. Ferrone
Building Official

Benny Beckham
Zoning Administrator

March 5, 2015

MEMORANDUM

To: James Harriott, Asst. County Manager

From: Steve Lachnicht, Director: Department of Growth Management

Re: Siting of Marijuana-Related Businesses in Alachua County

At the direction of the Board, County staff reviewed the Land Development Code to determine how marijuana-related businesses would be sited in Alachua County. Staff's analysis is based on the statute and currently proposed rule, both of which are subject to change in the next few months. As staff understands marijuana-related businesses, these businesses will have three functions: 1) cultivating the marijuana plants, 2) processing the marijuana plants; and 3) dispensing the marijuana product. Under the County's Code, these are agricultural, industrial, and commercial uses, respectively. These functions of the marijuana-related businesses would be allowed in their respective districts under the Land Development Code. The proposed state rules for these businesses are very detailed and appear to address any potential local concerns. Therefore, with the currently proposed rules, there does not appear to be a need for additional local zoning regulations.

The current draft of the proposed rules allows cultivating, processing, and dispensing to occur at one or more locations. Under the County Code, for example, the plants could be grown in a rural/agricultural district, processed in an industrial district, and dispensed in a commercial district. Based on staff's understanding of the process associated with cultivating, processing, and dispensing low THC marijuana, a marijuana-related business could be structured in multiple configurations, ranging from all three functions on a single site to each function on a separate site. Alachua County's Code would allow each of these configurations within proper zoning districts.

Under the current language of the proposed rules, applicants to the State for authorization to operate a marijuana-based business must demonstrate their ability to obtain zoning approval from the local government. Due to the ongoing rulemaking process, staff anticipates that it will be at least a month, likely longer, before a marijuana-related business will be operating within the County.

Part 3.A.3.d. Sketch or other illustration approximating the property boundaries, land topography, vegetation, proposed and/or existing structures, easements, wells, and roadways for each cultivation property proposed

CHESTNUT HILL TREE FARM NURSERY AND EXTRACTION LAB

15105 NW 94TH AVENUE ALACHUA, FL 32615

INDEX OF DRAWINGS

GENERAL
G010 COVER SHEET

CIVIL

LIFE SAFETY

ARCHITECTURAL
A100 SITE PLAN
A101 GROUND FLOOR PLAN
A102 GROUND FLOOR SECURITY PLAN

STRUCTURAL

MECHANICAL

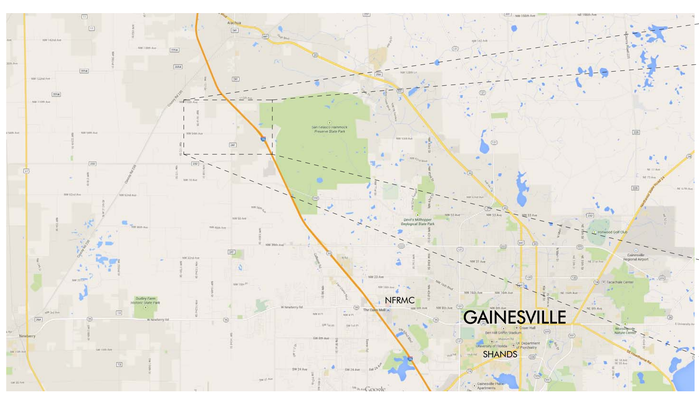
PLUMBING

FIRE PROTECTION

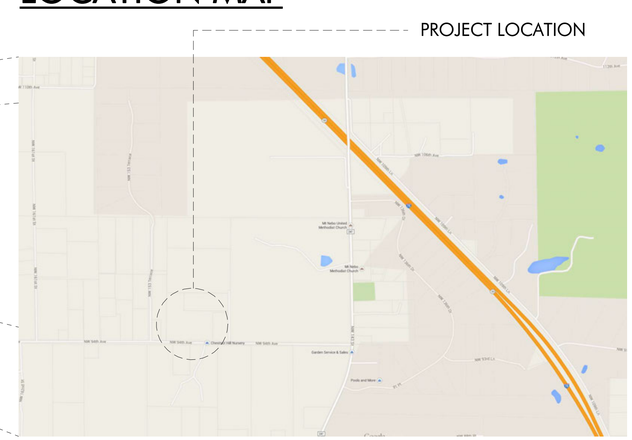
ELECTRICAL

TELECOM

PROJECT VICINITY



LOCATION MAP



PROJECT INFO.

BUILDING INFORMATION & LIMITATIONS

BUILDING OCCUPANCY CLASS:	XX (X)
CONSTRUCTION TYPE:	TYPE X X
SPRINKLERED:	Y/N
ALLOWABLE BUILDING HEIGHT:	x STORIES (X')
ALLOWABLE BUILDING AREA (PER STORY):	X,XXX GSF*

AREAS & OCCUPANT LOAD CALCULATIONS

TOTAL GROSS FLOOR AREA:	X,XXX GSF
NET FLOOR AREA:	X,XXX NSF
TOTAL OCCUPANT LOAD:	XXX OCCUPANTS

CONSULTANT:

CHESTNUT HILL TREE FARM
15105 NW 94TH AVENUE ALACHUA, FL 32615

CONCEPT

PROJECT NO.: XXXXXX

DRAWN BY: Author

ISSUE DATE: XX/XX/XXXX

REVISION SCHEDULE

REVISION NO.	REVISION DATE

SHEET TITLE: COVER SHEET

SHEET NO.: G010

CONSULTANT:

CHESTNUT HILL TREE FARM

15105 NW 94TH AVENUE ALACHUA, FL 32615

CONCEPT

PROJECT NO.:
XXXXXX

DRAWN BY:
XXX

ISSUE DATE:
XX/XX/XXXX

REVISION SCHEDULE	
REVISION NO.	REVISION DATE

SHEET TITLE:
SITE PLAN

SHEET NO.:
A100

Part 3.A.3.e. Description of the areas proposed for the cultivation of low-THC cannabis

i. Capacity, in square feet of growing area;
ii. Cultivation environment, e.g., greenhouse, clean room, aseptic, etcetera;
iii. Irrigation system(s); and
iv. Environmental control system(s).

DESCRIPTION OF THE CULTIVATION FACILITIES

Chestnut Hill Tree Farm has elected to construct new greenhouse facilities on the existing nursery property. The agricultural zoning allows for the construction to begin immediately as no permitting is required. Nexus Systems will be utilized to provide the design and installation services as well as materials provision. Nexus has designing quality greenhouses that maximize crop production and optimize profits for over 45 years. Nexus structures are known for their quality and affordability. They provide a team of in-house professional engineers licensed in 48 states. The timeline for installation is approximately 12 weeks from licensing.

Chestnut Hill Tree Farm chose a design that is common in commercial agriculture: greenhouse cultivation houses built adjacent to a processing head house. Architects and engineers working closely with cannabis industry consultants drafted the plans for the building layout. Consistent airflow, integral to the successful cultivation of cannabis plants, was a central component of the design. Another consideration was the flow of labor and materials through the facility. The Company will benefit from the vast commercial agriculture experience of its cultivation experts to implement best practices for cultivating medical cannabis. The design and production plan will optimize the use of available canopy space.

The 10,000 square foot cultivation facility will be built on the existing plot of agricultural land located at 14810 NW 94 Ave Alachua FL 32615. The property is leased, but features 100% common ownership with Applicant. The mortgagee has been noticed in accordance with the application requirements. The mortgage company has provided approval for the use as shown in the attached documentation. The size of the property provides a buffer between the proposed cultivation operation and neighboring properties. The facility will be enclosed with a 10’ metal perimeter fence with barbed wire running along the top, consistent with perimeter fence styles utilized by other high security facilities.

The exterior of the facility is consistent with an agricultural production facility. The large property provides a more than adequate buffer for enhanced security, while allowing amble area to operate. The exterior security measures include a high security fence and rolling gates at all access points providing protection from intrusion and additional reaction time for security staff responding to incidents.

The cultivation facility will be a total of 10,000 sq. ft. and will utilize additional space in the headhouse. The greenhouse cultivation area is 6,000 sq. ft. divided into 3 zones. A 4,000 sq. ft. headhouse will provide access the greenhouses via the central corridor. The headhouse will consist of secure storage areas for finished products, manufacturing space, and the offices and employee areas. There is a bulk production area in the headhouse adjacent to the greenhouses where freshly harvested crops will be brought for harvesting and processing, and curing. Secure drying and curing areas are included. The manufacturing sections of the headhouse consist of a commercial kitchen area, a product packaging area, a laboratory used for extractions, and processing, and a secure storage vault. An analytical laboratory area provides clean room areas for analytical testing and tissue culture. A secure shipping and receiving area is located in the facility.

ENVIRONMENTAL ADVANTAGES

The company's greenhouse cultivation presents many advantages over indoor cultivation while also still providing crop production from the elements. BOTEC Analysis Corporation provided the following analysis of greenhouse cannabis production for the Washington State Liquor Control Board in September, 2013:

Greenhouse cultivation demands significantly less energy than does indoor cultivation, though actual energy intensities vary widely. As sunlight is used for plant photosynthesis, most greenhouse energy consumption is due to heating, though a well designed greenhouse with built-in thermal inertia can keep itself warm most of the time by sunlight alone. Lighting can be augmented with lamps and may be needed to match the yields from fully indoor growing, particularly in the winter months.

A greenhouse for horticulture can include a wide range of design and operational features at correspondingly varying capital and operating costs. The enclosure itself can be plastic film, in one or two layers, over a frame, or glass (single or double pane) in a metal or wood construction. Ventilation is usually by gravity where panes in the roof can be opened, and mechanical shades, automated or manual, can provide photoperiod control and limit heat gain. Growing media include soil, media, or hydroponic tanks. Greenhouse operation has benefited from years of experience growing high-value crops like flowers and out-of-season vegetables and the technology should be easily adopted for cannabis.

Efficient greenhouse design is strongly dependent on location and climate, but several themes for good design emerge. Sanford 2010 recommends high efficiency condensing heaters, effective space utilization, basket fans for air circulation, control systems, and energy audits to reduce consumption. In particular, curtain systems can dramatically reduce energy costs. Curtain systems also allow growers to tightly control the amount of light their plants receive, enabling photo deprivation and other advanced growing techniques. Greenhouse cultivation of cannabis entails lower energy consumption, GHG production, water consumption, wastewater production, fertilizer application, and toxic risks than indoor cultivation. Table 1 - On-site energy and climate intensity of different cultivation methods per kilogram of product (cannabis):

	Energy kWh/kg		GHG kgCO2eq/kg	
	Low	**High**	**Low**	**High**
Outdoor	(minimal)	(minimal)	(minimal)	(minimal)
Greenhouse	6	580	1	282
Indoor	4400	6100	590	3000

GREENHOUSE CAPACITY

The greenhouses will consist of 3 greenhouse zones totaling 10,000 sq. ft. of covered greenhouse growing area. Each zone is 100 feet long by 33 feet wide, and has a total area of 3,300 sq. ft. The houses will be connected by a covered central corridor which will serve as a pad house and transport aisle.

Each of the flowering zones were designed to handle 1,980 plants at capacity. Each plant will produce approximately 1.0 pounds per harvest. Using this formula, each harvest would yield approximately 5,940 pounds. Each zone will be flowered 5.2 times a year, equaling a total yearly harvest at the facility of over 15 tons. Additional features of the greenhouses include:

- Diffused polycarbonate roofs
- Evaporative pad cooling systems
- Light deprivation system

- Benches with underbench hot water heat and drip irrigation systems
- Complete grow light systems
- Computerized controller
- 4” sq galvanized steel columns (w/ Column Stubs)
- 1,310 ft under gutter drip channel – runs under the gutter to catch all condensation
- Ecosorb odor mediation system – 6 for each zone / house

HEADHOUSE LAYOUT

The head house will be divided lengthwise north and south by a hallway between the rooms. This hallway will allow access to all the rooms along the corridor. The head house is accessed from the south. A secure vestibule provides opportunity for a security employee to check in each individual. A CustomVault environmentally controlled storage vault of 185 sq. ft. is located in the southeast corner of the building. Two administrative offices of 165 sq. ft. each and a conference room/kitchenette of 220 sq. ft. complete the administrative areas. Two ADA restrooms are designed at the end of the hallway flanking the entrance to the trimming/drying/curing room of 1,020 sq. ft. Plants are brought directly into this area to prevent contamination events in the rest of the facility. A secure walk-in refrigeration unit of 193 sq. ft. provides environmentally controlled storage for the processing and manufacturing functions.

Cured, raw cannabis is prepared for extraction in the drying/curing room and processed in the extraction/processing room which provides 310 sq. ft. of work space. The neighboring clean lab and scrub room provide 360 sq. ft. of area featuring clean room standards for the independent laboratory operator. The 290 sq. ft. propagation room shares the clean room controls to ensure shoots and clones remain disease free in their most fragile state.

LIGHTING

The primary light source of photosynthetic energy for plant growth will be the sun. The company specifically chose a greenhouse design for environmental benefits and increased production capacity. The greenhouse roof will be glazed with Guardian Agro diffused glass[2]. Lighting for day-length extension or supplemental photosynthetic lighting will be provided by a combination of high pressure sodium (“HPS”) lighting with electronic ballasts and tuned reflectors for enhanced efficiency, florescent and LED lighting.

POWER ALLOCATION

The site provides sufficient power for the new construction featuring 3 phase power provided by Clay Electric Co-op.

CULTIVATION ENVIRONMENT

The company will implement ISO Class 7 clean room requirements in all cultivation areas. Class 5 requirements will be met in cloning and tissue culture operations. A clean room has a controlled level of contamination that is defined by the number of particles per cubic meter at a specified particle size. Clean rooms are not sterile or free of uncontrolled microbes, only airborne particles are controlled. There is no such thing as zero particle concentration. The ambient air outside in a typical city environment contains 35,000,000 particles per cubic meter, 0.5 mm and larger in diameter, corresponding to an ISO 9 clean room which is at the lowest level of clean room standards.

[2] http://www.guardianagro.com/cs/groups/agro_europe/documents/web_content/stg_008731.pdf.

In cannabis operations, clean rooms are often used for tissue culture, cultivation, processing, manufacturing, packaging, and analytical operations where air quality is critical to the purity of the end products. Chestnut Hill Tree Farm will produce high quality, safe cannabis for use in manufacturing of medicinal cannabis products. Balancing cost factors is important to keep the price affordable for the most patients possible. The extraction operations required by the low-THC regulations provide additional purity protocols that allow for low contamination levels in the grow operation. These acceptable levels of contamination in the cultivation operation will be fully mitigated during extraction. Therefore, the company will not implement fully classified clean rooms, but will use some clean room practices to control contamination levels to the Class 7 level. An anteroom (known as a "gray room") is used to put on clean-room clothing. The facility's low-level clean rooms only require special shoes, with special soles for wet traction that do not track in dust or dirt. However, the company will also provide laundered scrubs for cultivation and processing staff.

Factors including temperature, humidity, and pressure are controlled in the clean room environment to reduce particulate contamination. The key component in the greenhouse clean room environment is High Efficiency Particulate Air ("HEPA") filtration that is used to trap particles that are 0.3 micron and larger in size. All air passes through HEPA filters, and in some cases where stringent cleanliness performance is necessary, Ultra Low Particulate Air ("ULPA") filters are used. The greenhouse is designed to remain at a positive pressure so if any leaks occur, air leaks out of the environment instead of unfiltered air coming in.

For tissue cloning and tissue culture functions, laminar, or unidirectional, air flow systems direct filtered air downward in a constant stream. Laminar air flow systems are employed across 100% of the hood to maintain constant, unidirectional flow. Laminar flow criteria is generally stated in portable work stations ("LF hoods"), and is mandated in ISO-1 through ISO-4 classified clean rooms. The company will utilize portable clean room technologies.[3] SentryAir provides the following description of the portable clean room:

The Portable Clean Room is a compact positive pressure system designed to provide exceptionally clean laminar airflow inside the hood. The cabinet has been tested as an ISO Class 100 (ISO 5) clean room. The system utilizes a dual stage filtration process which consists of a MERV8 pre-filter and a HEPA filter. The HEPA filter has an efficiency rating up to 99.97% efficient on particles .3 micrometers and larger. For applications requiring a higher efficiency an ULPA filter is available. The ULPA has an efficiency rating of up to 99.9995% at .12 micrometers. Typical uses for the hood include electronics assembly, medical preparation, non-sterile compounding, and various other applications that require an ultra-clean environment.

These hoods are designed to be cost saving. Traditionally, companies that desired a clean sterile space would have to convert an entire room into a HEPA filtered positive pressure area. In many cases, only a small amount of space would be sufficient for their given application. These companies end up spending tens of thousands of dollars and take up excess room. The SS-340-PCR (Positive Pressure clean room) is a compact solution measuring 40"W x 24"D x 24"H (I.D). This system will save money and space. In addition, because the system is portable you have the flexibility to move the system if required.

The hoods are exclusively built by Sentry Air Systems and go through a stringent quality assurance process prior to be shipped. Each hood is tested with a laser particle scanner to ensure that it meets the stringent requirements set by Sentry Air. To date, there has never been a report of faulty workmanship on a Sentry Air Systems positive pressure laminar flow hood.

[3] http://sentryair.com/blog/portable-clean-room-hoods/portable-clean-room-hood-ss-330-pcr/

CLEAN ROOM PROTOCOLS

There are several components that affect the level of control of contamination. However, there are basically two significant factors in contamination control—the environment and the people working in the environment. Protocols to evaluate the critical points of the clean manufacturing process were developed for the operation. Equipment inside the clean room is designed to generate minimal air contamination. Only special mops and buckets are used and furniture is designed to produce a minimum of particles and to be easy to clean.

Personnel selected to work in clean room areas will receive extensive training in contamination control practices. Of all the components in clean rooms and controlled environments, employees contribute the greatest amount of contamination, yet these same employees have the ability to exercise greatest amount of control over the environment.

Advancements in weaving technology has produced undergarment fabrics (scrubs) with reduced pore size equal to that of clean room fabrics used for coveralls, hoods, and boots. Therefore the 100% polyester, long-sleeved shirts and pants are suitable for wearing in ISO Class 6, 7, and 8 clean rooms with and/or without additional clean room garments. The company's Class 5 areas only require gloved hands and lab coats. There are several resources for information to train personnel in contamination control practices and procedures. Training provided to staff will review:

- The International Standard, ISO 14644-5 "Clean rooms and Associated Controlled Environments – Part 5: Operations;"
- IEST-RP-CC027.1, "Personnel, Practices and Procedures in Clean rooms and Controlled Environments;" and
- IEST-RP-CC003.3, "Garment Considerations for Clean rooms and Other Controlled Environments."

After training cultivation personnel in contamination control theory, the cultivation manager will evaluate the implementation of the training for compliance. A written test may serve as objective evidence of attendance and knowledge base. However, observation of daily execution of the contamination control principles and routine test data of viable and non-viable particle counts of the personnel, air, and surfaces of the controlled spaces is the required objective evidence when auditing for compliance.

IRRIGATION SYSTEMS

The operation will utilize a combination of drip irrigation systems and hand watering techniques. The cultivation plan calls for organic nutrient formulations. These nutrient system are known to clog most drip irrigation lines. This fact, combined with the company's use of on-site wells and untreated water will required the Cultivation Director to test several drip lines prior to selecting one for final use.

ENVIRONMENTAL CONTROLS

AIR EXCHANGE AND AIR FLOW

Air exchange and circulation will be controlled by an Argus computerized control system. Each greenhouse zone will be designed for up to one air change per minute with a minimum air speed of 88 ft per minute against 0.20 inch static pressure. Exhaust air will be treated with Ecosorb® natural organic odor neutralizer[4] during the flowering phase.

[4] http://odormanagemen
t.com/

CO_2 GENERATION

The medical cannabis crops will primarily receive CO_2 from the ventilation in the greenhouse. The environmental controller will add additional CO_2 into the environment when levels drop below 800 ppm.

COOLING FEATURES

The cooling functions of the greenhouse will be divided into stages. Cooling functions associated with each stage will be pre-programmed into the Argus environmental control system, and cooling demands will dictate which stage of cooling functions is engaged. Stage 0 is the lowest stage, while stage 3 will be used for the highest cooling demands. The shade curtains will also work in conjunction with the cooling systems to provide additional temperature control. The stages of cooling to be used within the greenhouse facility are:

- Stage 0: HAF fans on, ventilation fans off (HAF fans will remain on 24 hours/day)
- Stage 1: Ventilation fans on low
- Stage 2: Ventilation fans on high
- Stage 3: Ventilation fans on high plus wet wall pad pump turned on

The cultivation facility will feature 12, 6' tall x 35' long, 6" thick evaporative cooling pad systems. These systems differ from traditional air-conditioning ("HVAC") systems in that they lower the temperature through the phase transition of liquid water to water vapor (evaporation), which cools air using much less electricity than refrigeration. The pad cooling system will require the use of industrial dehumidifiers.

Opposite of these cooling pads will be several 50", single HP metal exhaust fans, 4 per zone. These fans will pull outside air through the cooling pads to exchange the air of the greenhouses and keep humidity at acceptable levels.

Each greenhouse zone will be designed for up to one air change per minute with a minimum air speed of 88 ft. per minute against 0.20-inch static pressure. Exhaust air will be treated with Ecosorb® natural organic odor neutralizer. Circulation within the greenhouses will be handled by 69 truss-mounted Horizontal Air Flow ("HAF") fans, each 12" in diameter. These HAF fans offer many benefits to the greenhouse environment:

- Stagnant air pockets will be nearly eliminated
- Corners of greenhouse will be 'scrubbed' eliminating hot and cold spots
- Condensation will be greatly reduced
- Carbon dioxide utilization will be improved
- Humidity within the plant canopy will be reduced
- Consistency in temperature between the north and south ends of the greenhouse will be dramatically improved.

ARGUS CONTROLLER

Argus Titan II controllers will be customized to manage the greenhouse environment. The controllers can also be easily networked together for seamless control of any sized facility. The system starts with an Access Point controller which is equipped with alarm contacts, a battery backup, and smart charging circuitry. The system is expanded as needed. Argus controllers use separate I/O Modules for all sensor inputs and equipment control outputs. This allows tight integration with the layout of the greenhouse facility and the company's equipment systems. All control programs are executed from the controllers. Managers can access the Argus system from a PC and communicate directly with the controllers. When the cultivation staff is not on-site, the Argus controllers will automatically operate all of the controlled equipment in accordance with the company's settings and control targets.

For maximum safety and reliability each controller operates autonomously and all controllers are continuously monitored.

Argus provides sophisticated humidity control required for Florida's climate. The Argus Climate Energy balance program calculates separate heating and cooling requirements for temperature and humidity control. Separating the functions allow the system to independently calculate the degree and nature of the control response that is required for both humidity and temperature management, and to act accordingly. The environmental controller can also control the relative resources that can be used for either objective.

Part 3.A.3.f. A description of the ability or plan to expand any of the areas proposed for cultivating low-THC cannabis

In order to meet initial and future qualifying patient in a quick and efficient manner with minimal impact on the environment and the surrounding community, the company will build out all cultivation spaces during the initial construction phase, with multiple separated cultivation zones. These separate cultivation areas allow not only for quick expansion of production, but allows for well-planned production schedules, the separation of similar strains, and allows for strict environmental controls in each area to allow for variable temperature, humidity, and carbon dioxide levels based on individual strain requirements. The ability to control these conditions with precision is the greatest biosecurity measure that can be taken to diminish the opportunity for environmental concerns such as pests, mold, and mildew.

All cultivation areas will be finished during initial construction and equipped with all branch utility services, including mechanical, plumbing, lighting, and other power connections, as well as all final security surveillance and access control devices. The company will completely equip approximately one third of its full capacity for vegetative and flowering cultivation spaces with the necessary equipment and supplies to begin cultivating medical cannabis immediately upon licensing. The remaining cultivation zones will be “plug and play” so that production can be rapidly expanded in order to both meet immediate patient demand and to provide sufficient production in order to maintain a projected one year supply of products for a back-up measure. This phased approach ensures that all demolition and construction activity is completed prior to the start of operations and before medical cannabis plants enter the facility.

Chestnut Hill Tree Farm anticipates that the facilities developed for the current legislation is more than sufficient to meet demand for several years. However, should demand exceed production capacity addition land is available for additional greenhouses or secured outdoor crops.

BIOTRACKTHC

BioTrackTHC enables the business to collect, store, and retrieve all data and activity - with respect to inventory records, inventory-tracking records, supplier records, patient records, client-records, employee records, recall reports, quarantine and waste reporting, sales/transaction records, disposal records, and all scanned documents -- at any time (real time), either in-system or through the report creation tool. Though system actions can be adjusted or voided, at no time is any data ever fully deleted as BioTrackTHC maintains a log of every action, including adjustments and voids, so that the entire history of the system may be reconstructed. The availability and report ability of the system data enables the said entity to produce any information necessary for the OCU during an inspection or at their request.

INTERNAL PROTOCOLS

Chestnut Hill Tree Farm has pre-developed emergency management procedures for implementation if licensed. The organization plans to manage risk throughout its operations to ensure consistent supplies for patients even in times of emergency. The company will focus on the following risk management strategies:

- Inventory planning;
- Cross training and insurance for key personnel;
- Retention of consultants and industry experts; and
- Providing emergencies utilities required for minimal operations.

The executive team will routinely evaluate risks and develop mitigation strategies where needed to ensure business operations and product supply.

INVENTORY PLANNING

Based on the company's observation and analysis of the growth rates of medical cannabis programs in similar states including Arizona, Connecticut, Massachusetts, and Illinois, we expect a slow ramp-up of Florida medical cannabis patients. The facility's capacity for production will allow for overproduction in the first few years of operation. This over supply will allow the company to warehouse excess finished products for distribution in case of an operational shut down for any reason. A first in, first out inventory method will be used to for all product inventory. The target inventory of the operation will be set at one year's projected inventory of all finished products. This inventory will be highly secured and anti-diversion protocols will be implemented throughout its lifecycle.

KEY PERSONNEL

The company's staffing plan contemplates cross training for all key personnel. This integrated organizational structure allows the maintenance of the company's high operating standards even when key personnel are absent. Each operating unit will always ensure that a minimum of two staff members are capable of managing the highest functions of the unit.

Additionally, the company will carry key employee insurance for the head of each operating unit. This precaution will cover the cost of replacing an integral team member in case of an unexpected disability or death. The policy will allow the company to immediately bring in consultants and industry experts to help manage and recruit and train a replacement so that no operational interruptions occur.

RETENTION OF EXPERTS

Multiple industry experts have already been retained by the company as advisors for the planning and application process. These experts will remain engaged with the company during start-up operations. They provide professional back-up options for all cultivation functions in the organization. These advisors have allocated time to assisting the company and will be available in any emergency scenario to provide operational functionality until normal operations are restored. As these experts designed the company's operating model, they are the best solution during stressed operating periods.

UTILITIES REDUNDANCY

The company will employ the use of a generator with sufficient power to operate all critical equipment during an emergency situation. The greenhouse does not require emergency lighting as natural light will be sufficient to maintain plant health, but the facility does require emergency power to operate shade and black out curtains and the environmental control systems. A generator will be used to provide sufficient power to critical systems for a least one week. The company's back stock will allow the operation to safely shut down operations if needed during a hurricane evacuation.

Part 3.A.3.h. A description of one or more strains of low-THC cannabis the applicant intends to cultivate

Chestnut Hill Tree Farms, LLC has engaged in a Letter of Intent with Citiva Medical, LLC ("Citiva"). Citiva was founded by Josh Stanley, one of the creators of the Charlotte's Web strain of cannabis. The Letter of Intent provides the company access to the strain and other genetic plant material. The innovative licensing partnership will allow both organizations to share low-THC cannabis strains and formulations of Derivative Products created for the strains.

CHARLOTTE'S WEB (20% CBD)

In 2011, the Stanley brothers from Colorado developed a variety of marijuana that was high in CBD and low in THC for people suffering from cancer. But after stopping the unrelenting seizures of a 3-year-old girl, the siblings realized a unique benefit of the high-CBD strain. The girl's name was Charlotte, and the strain was dubbed "Charlotte's Web".

Charlotte's Web is believed to be the highest CBD strain in the world. It contains 20% CBD and less than 0.5% THC.

It all started with a phone call came from Charlotte's parents, Matt and Paige Figi. Their daughter was born with Dravet syndrome, and suffered from more than 300 seizures a week. After pharmaceutical options and diet changes failed to control the illness, the family made the decision to try medical marijuana. Despite some concern about her young age, the Stanley brothers decided to give Charlotte an opportunity to try an oil-based extract made from the unique strain — with great success.

Soon parents from all over the country were flocking to Colorado to try this unconventional medication for their own children's epilepsy. Results were mixed; Charlotte's Web helped some epileptic children but not others. In an effort to solve this mystery, researchers at the University of Colorado are studying the genetic differences between patients who do or do not respond to CBD-rich cannabis.

The Stanley brothers operate a non-profit called the Realm of Caring, which announced in September that Charlotte's Web Hemp Oil can now be shipped to all 50 states, at a cost of $250 per bottle. Because the oil contains less than the maximum THC allowed for food products, according to federal hemp legislation, the product is likely legal in all U.S. states. (Source: http://www.leafscience.com/2014/10/15/highest-cbd-strains/)

AC/DC (19% CBD)

ACDC is a sativa-dominant phenotype of the high-CBD cannabis strain, Cannatonic. One remarkable characteristic of ACDC is its THC:CBD ratio of 1:20, meaning this strain induces no psychoactive effects. Tests have put ACDC's CBD content as high as 19%, which helps many patients treat pain, anxiety, epilepsy, multiple sclerosis, and the negative effects of chemotherapy, all without intoxication. (Source: https://www.leafly.com/hybrid/acdc)

Part 3.A.3.i. Access to water resources that allow for sufficient irrigation

Chestnut Hill Tree Farm has four 4” wells on-site. Each well has a 5 hp submersible pump. Pursuant to Rule 64-4.002(2)(c), the company shall have efficient access to water resources that allow for sufficient irrigation. Chestnut Hill Tree Farm recognizes limited water resources exist and its role in preserving this natural resource. Water conservation is a primary operational goal and mission of the operation. The Cultivation Director will ensure that all cultivation operations comply with applicable state and local water regulations.

The company’s executive team shall consistently review water resources, quality, and technological advancements in relation to cultivation. All cultivation employees shall be trained on the proper handling and storage of water with a focus on avoiding contamination, however, only highly trained cultivation employees will be responsible for irrigation. Irrigation equipment shall be professionally maintained per the manufacturer’s recommendations. Any parts that may be a source of contamination shall be cleaned, sanitized, and replaced as often as needed. Programmable irrigation equipment will be inspected daily to ensure accuracy of applications.

All water used for cultivation shall meet Human Health Standards for water quality. The Cultivation Director is responsible for testing the water source quarterly, after any unusual natural event, and when PPM/pH readings change significantly. Testing shall identify any pathogenic microbes that may be present in water supplies (e.g., E-coli and other coliforms), heavy metals, pesticide residues, or other contaminants. The company will maintain all water maintenance and quality records in the water maintenance log for a minimum of five years.

The most recent water quality reports shows that the Chestnut Hill Tree Farm water supply is free from bacterial contamination.

paid $25 6/18/15 BR

DRINKING WATER BACTERIOLOGICAL SAMPLE COLLECTION AND LABOATORY REPORTING FORMAT

PWS I.D. [ ][ ][ ][ ][ ][ ][ ]

Alachua County Health Department - E - 22701
Environmental Health Section
224 S.E. 24th Street
Gainesville, FL 32641

Lab Receipt Date & Time:
Analysis Date & Time: 6/22/15 @ 1611
Sample Acceptance Criteria:
Sample Preservation [X] On Ice [ ] Not On Ice [ ] 12 °C
Disinfectant Check [X] Not Detected [ ] ____ mg/L
This sample does not meet the following NELAC requirements:

ACHD-E22701
2015 JUN 22 AM 10 09
A. DENNIS

Report Number: 15-1075 Sub-Contract Lab ID: ____

Analysis Requested: (please check all that apply)
[X] Standard Coliform Test
[ ] HPC
[ ] Other: ____

System Name: Chestnut Hill Tree Farm
System Address: 14810 NW 94 Ave
City: Alachua
System or Owner's Phone #: 352-219-5825
Fax #: 386-462-4370
Collector: R.O. Wallace
Collector's Phone #: 352-219-5825
chnuts@gmail.com

Type of Supply: (check only one)
[ ] Community Water System [ ] Transient Noncommunity Water System [ ] Nontransient Noncommunity Water System [ ] Limited Use System
[X] Private Well [ ] Swimming Pool [ ] Bottled Water [ ] Other ____

Reason for Sampling: (check only one) [ ] Routine Compliance [ ] Repeat [ ] Replacement [ ] Main Clearance [X] Well Survey [ ] Other

Sample Collection Date 6-22-15 Report Issue Date 6/22/15

To be completed by collector of sample						To be completed by lab				
						Total Coliform Analysis Method: SM 9223B				
						Fecal or E. coli Analysis Method: SM 9223B				
Sample Number	Sample Point (Location or Specific Address)	Collection Time	Sample Type[1]	Disinfect Res'd (mg/L)	pH	Non Coliform	Total Coliform	Fecal or E. coli	Data Qualifier[2]	Lab Sample Number
1	Well	9:00 am					A			15-1075

Average of disinfectant residuals for routine and repeat samples. (Complete for community and nontransient noncommunity systems serving populations up to and including 4,900. Do not include raw or plant samples in the average.)

[2]Defined in Florida Administrative Code Rule 62-160, Table 1
All tests are performed in accordance with NELAC standards.
*Questions concerning above results, contact person signing below:
Date PWS notified by lab of positive results ____
Date State notified by lab of positive results ____

Disinfectant Residual Analysis Method: [ ] DPD Colorimetric [ ] Other ____
Person performing analysis is:
[ ] A certified operator (# ____) [ ] Employed by a certified lab
[ ] Supervised by a cert operator (# ____) [ ] Employed by DEP or DOH

Lab Signature: [signature]
Title: AA II Phone #: 331-7930

Name and Mailing Address of Person to Receive Report

DEP/DOH USE ONLY
[ ]
[X] Satisfactory
[ ] Incomplete Collection Information
[ ] Repeat Samples Required
[ ] Replacement Samples Required
Date Reviewed by DEP/DOH: 6/22/15
DEP/DOH Reviewing Official: [signature]

[1]DEP Sample Type Codes: D = Distribution (Routine Compliance); C = Repeat or Check; R = Raw; N = Entry to Distribution; P = Plant Tap; S = Special (clearance, etc.)
Analysis Methods: MF = SM9222B & D; MTF = 9221B & EC/MUG; MMO/MUG = SM9223B; HPC = SM9215B
Results: A = coliforms are absent; P = coliforms are present; C = confluent growth; TNTC = too numerous to count

Relinqished by:		Date	Time	Received by:		Date	Time
1.							
2.							

REPORT RESULTS RELATE ONLY TO SAMPLES REFERRED TO ON THIS FORM.

Part 3.A.3.i. Access to water resources that allow for sufficient irrigation

Part 3.A.3.j. A list of current and proposed staffing for cultivation

i. Position, duties and responsibilities;
ii. Resume; and
iii. Professional licensure disciplinary action in all jurisdictions.

STAFFING PLAN

The company's staffing protocols detail the processes the Chief Executive Officer and Chief Operating Officer will use to manage the company's human resources to provide customer accessibility and cultivation operations in compliance with state law and OCU regulations. The Chief Operating Officer is assigned the responsibility for maintaining and updating the staffing policies, which will ensure that the company has sufficient staff possessing the correct skill-sets and experience needed to ensure the success of all operations. The staffing plan will be updated at least annually.

Currently the operation has selected the following staff members:

- Chief Executive Officer – Robert Wallace
- Chief Operating Officer – Susan Baumgartner
- Chief Financial Officer – Deborah Gaw
- Cultivation Director – Codi Coleman
- Information Technology Manager – R. Dunstan Wallace
- Inventory Manager – R. Dunstan Wallace
- Medical Director – Dr. Richard Tempel
- Security Director – John Powell

Advisors engaged for services post-licensing include:

- Cannabis medicine - Margaret Gedde, MD. PhD
- Compliance and operations - Jill Lamoureux
- Extraction - Shannon Wilson
- Healthcare - Donn Dennis, MD
- Healthcare - Mark Rice, MD
- Quality Assurance - Jahan Marcu, PhD
- R&D – Citiva & Josh Stanley

The following cultivation positions will be filled upon licensing:

- Quality Assurance Officer
- Compliance Officer
- Human Resources Manager
- Cultivation Manager
- Cultivation Technicians
- Harvest Technicians

The Cultivation Director is ultimately responsible for all staff in the cultivation unit. The Director will be familiar with the layout and technical specifications of the facility, all equipment utilized, and able to perform and train others to perform all activities necessary in the facility. The company is dedicated to training all employees to excel in their position through on-the-job training and classroom learning opportunities. Third-party training will be provided when determined to be beneficial by the Director and may include training on personnel safety, food safety, good agricultural practice, and management practices.

The Cultivation Director will hire the necessary staff to ensure the cultivation of quality medical cannabis in accordance with regulations BMP, GAP, GHP, and GCP. Staffing estimates will be updated regularly. Generally, for each 5,000 square feet of flowering canopy, in addition to the Director and Cultivation and Processing managers the operation will employ:

- 3 – FTE Cultivation Technicians
- 2 – PTE Harvest Technicians
- 2 – PTE Maintenance Technicians

ADVISORY ROLES

The company has engaged a team of advisor to assist the transition to the new medical cannabis line of business. These advisors provide the company the opportunity to access expert advice that would not be available for hire. The advisors who will be in close contact with products will also be contract employees of the company, defined as employees for legal purposes. Those who simply provide operational advice and guidance will receive stipends for participation in regular meetings of the strategic advisory board and will be compensated for any additional time providing specific advice. The advisory board will help set the strategic goals for the company, while assisting with day-to-day start-up and business development in the beginning stages of the operation. These advisory will help the company avoid critical errors that could prevent medical cannabis supplies from getting to patients who have been waiting for a great deal of time for the program to become functional.

ADVISORY BOARD

The strategic advisory board, if utilized to its maximum potential, will serve as an asset to the company, its stakeholders, and community. Strategic advisory board members provide resources that help create sustainability within the company by serving in the following capacities:

- Providing guidance and mentorship
- Networking with other business leaders
- Recommending and overseeing projects
- Providing access to needed resources
- Serving as back-up for existing job functions

Despite the many benefits, the strategic advisory board provides three main benefits to the company:

- Sustainability of the team – the board provides continuity to the company over the long term. The board also provides credibility to the company, making it easier to build stable partnerships and obtain funding.
- Expertise and advice – board members bring a wide range of backgrounds and real-world experience to the table which can be applied to situations faced by the company.
- Resources – In addition to their expertise and advice, board members can provide a wealth of other resources. Such resources include networking contacts, sponsorship, employment/volunteer experiences, access to facilities or equipment, and more.

Strategic advisory board members are key individuals who provide insight on operations and are a vital part of the success of the company. Strategic advisory board members are selected by the company's executive team and may include:

- Community leaders from business, educational, and civic organizations.
- Cannabis and healthcare industry experts and advocates.
- Active members from organizations such as the Chamber of Commerce, Rotary Club and Economic Development Groups.
- Local businesses with common stakeholders.

- Members of financial institutions or investment companies.

Currently, the advisory board serves three year terms for continuity in the beginning stages of the business and is scheduled to meet four times per year. The end of year meeting will be used to set goals and provide planning for the upcoming year.

The Chief Executive Officer will appoint a strategic advisory board coordinator to manage the communications and activities of the members. Required board activities include:

- Annual on-site meeting
- Quarterly teleconferences
- Review calls as needed

CULTIVATION JOB DESCRIPTIONS

CULTIVATION DIRECTOR

Reports to: Chief Operating Officer

Job Description: Plan and execute medicinal cannabis production from propagation to harvest. Follow all regulatory requirements for medicinal cannabis production. Produce safe cannabis securely, efficiently and effectively.

Job Responsibilities: Specify all inputs and environmental conditions for crop production. Schedule crops to maximize production and minimize unused greenhouse space. Direct the Cultivation Manager and Processing Manager. Work closely with all company directors and managers to coordinate work activities.

Core Job Duties
Support and Management:

- Responsible for directing the Cultivation Manager. Serves in the manager role when necessary.
- Responds to all employee questions, concerns, or suggestions and takes action when necessary to resolve conflicts.
- Coordinates with the executive management team to ensure accurate information is communicated to the cultivation staff.

Cultivation Operation Management:

- Oversees all cultivation tasks and processes, ensures proper documentation of all applicable activities in accordance with regulations and standards set by the company.
- Oversees product development by ensuring the proper tasks are executed and the environmental conditions support the cultivation of superior product quality.
- Oversees procurement to ensure efficient levels of all cultivation inputs and supplies.

Reports and Documentation:

- Oversees the maintenance of accurate records of all cultivation activities including employee records, inventory records, crop application records, materials receipt, returns, etc. in accordance with regulations and standards set by the company.

Qualifications:

- Must be a team player working across functions.
- Ability to communicate frequently and effectively with management and staff.
- BS degree in horticulture, agriculture or plant sciences and five years of commercial experience with crop production in controlled environments. Industry experience may be considered in place of a degree.
- Effective and experienced personnel manager.
- Experience with crop scheduling, management of a clean stock propagation program, crop nutritional management, and IPM, especially biological control.
- Ability to manage production research trials for developing and perfecting new production practices.
- Strong time management, record keeping, analytical and problem solving skills.
- Working knowledge of regulatory requirements including the Florida Agricultural Worker Safety Act (“FAWSA”).

- Proficient in the use of computer software such as Microsoft Excel and Word and environmental control systems and able to learn other software applications quickly.
- Must be sufficiently proficient in English to read and interpret documents such as safety and security rules, operating and maintenance instructions, procedure manuals, etc. and write routine reports.
- Must be able to stand and walk on concrete floors, be able to work in a hot and/or humid environment, be able to lift 50 pounds.
- Must have or be able to earn a Florida pesticide applicator license.
- Must be able to wear a respirator and personal protection equipment for pesticide applications.
- Must pass a Level 2 background check.

CULTIVATION MANAGER

Reports to: Cultivation Director

Job Description: Assist in the planning and execution of medicinal cannabis production from propagation to harvest. Follow all regulatory requirements for medicinal cannabis production. Produce safe cannabis securely, efficiently and effectively.

Job Responsibilities: Responsible for managing the day-to-day operations of cultivation operations in accordance with regulations and standards set by the company. Provides support for all cultivation employees, including schedules, training, policy and procedure updates, industry news, and product information. Responsible for the documentation, ordering, and receiving of all inventory and products, arranging deliveries, maintaining facility compliance, and cleanliness.

Core Job Duties
Support and Management:

- Responsible for managing cultivation staff, schedules, cultivation processes, inventory, and vendor relations.
- Serves as a role-model and resource for cultivation staff concerning products and services, policies and procedures, industry news, and changes in regulations.
- Responds to all employee questions, concerns, or suggestions and takes action when necessary to resolve conflicts.
- Responsible for delegating tasks to cultivation employees in order to maintain a compliant and clean cultivation facility.
- Coordinates with the upper management team to ensure accurate information is communicated to the cultivation staff.

Cultivation Operation Management:

- Oversees all cultivation tasks and processes, ensures proper documentation of all applicable activities in accordance with regulations and standards set by the company.
- Plans, coordinates, and oversees the transition of product development by ensuring the proper tasks are executed and the environmental conditions support the cultivation of superior product quality.
- Oversees supply stock, orders, and deliveries to ensure efficient levels of all cultivation inputs and supplies.

Reports and Documentation:

- Maintain accurate records of all cultivation activities including employee records, inventory records, crop application records, materials receipt, returns, etc. in accordance with regulations and standards set by the company.

Qualifications:

- Two year degree in a horticultural or agricultural field, or demonstrated experience in horticulture or agricultural production.
- Two years of experience in a position with managerial responsibilities.
- Excellent communication skills and attention to detail.
- Effective time-management and ability to multi-task.
- Ability to work in a fast-paced, changing and challenging environment.
- Working knowledge of regulatory requirements including the Florida Agricultural Worker Safety Act (“FAWSA”).
- Proficient in the use of computer software such as Microsoft Excel and Word and environmental control systems and able to learn other software applications quickly.

- Must be sufficiently proficient in English to read and interpret documents such as safety and security rules, operating and maintenance instructions, procedure manuals, etc. and write routine reports.
- Must be able to stand and walk on concrete floors, be able to work in a hot and/or humid environment, be able to lift 50 pounds.
- Must have or be able to earn a Florida pesticide applicator license.
- Must be able to wear a respirator and personal protection equipment for pesticide applications.
- Must pass a Level 2 background check.

CULTIVATION TECHNICIAN

Reports to: Cultivation Manager

Job Description: Produce medicinal cannabis from propagation to harvest. Follow all company SOPs and regulatory requirements for medicinal cannabis production. Produce safe products securely, efficiently and effectively.

Job Responsibilities: Implement cultural practices to produce high quality crops following production guidelines.

Core Job Duties:

- Performs cultivation tasks and processes, ensures proper documentation of all applicable activities in accordance with regulations and standards set by the company.
- Maintains supply stock, orders, and deliveries to ensure efficient levels of all cultivation inputs and supplies.
- Maintains accurate records of all cultivation activities including inventory records, crop application records, materials receipt, returns, etc.

Qualifications:

- Must be a team player working across functions.
- Ability to communicate frequently and effectively with management and staff.
- BS or AS degree in horticulture, agriculture or plant sciences and three years of commercial experience with crop production in controlled environments. Industry experience may be considered in place of a degree.
- Experience with day-to-day management of crops in controlled environments including nutritional management and IPM, especially biological control.
- Works well with minimal management.
- Must be sufficiently proficient in English to read and interpret documents such as safety and security rules, operating and maintenance instructions, procedure manuals, etc. and write routine reports.
- Must be able to stand and walk on concrete floors, be able to work in a hot and/or humid environment, be able to lift 50 pounds.
- Must have or be able to earn a Florida pesticide applicator license.
- Must be able to wear a respirator and personal protection equipment for pesticide applications.
- Must pass a Level 2 background check.

PROCESSING MANAGER

Reports to: Cultivation Director

Job Description: Manages theharvest, trimming, drying, curing and any other processing of medicinal cannabis in preparation for extraction operations.

Job Responsibilities: Schedule and manage all activities related to harvest and processing of medicinal cannabis. Ensure all work is accurately recorded, conducted safely, securely and in accordance with SOPs. Maintain highest quality of the cannabis product. Work closely with the Cultivation Manager to coordinate work activities. Manage processing technicians.

Core Job Duties
Support and Management:

- Responsible for managing processing staff, schedules, harvest processes, inventory, and vendor relations.
- Serves as a role-model and resource for processing staff concerning products and services, policies and procedures, industry news, and changes in regulations.
- Responds to all employee questions, concerns, or suggestions and takes action when necessary to resolve conflicts.
- Responsible for delegating tasks to processing technicians in order to maintain compliant and clean processing areas.
- Coordinates with the executive management team to ensure accurate information is communicated to the processing staff.

Cultivation Operation Management:

- Oversees all processing tasks and processes, ensures proper recording of all activities in accordance with regulations and standards set by the company.
- Plans, coordinates, and oversees the quality of harvested cannabis by ensuring the proper tasks are executed and the environmental conditions do not support contamination.
- Oversees supply stock, orders, and deliveries to ensure efficient levels of all processing supplies.

Reports and Documentation:

- Maintain accurate records of all processing activities including harvest records, inventory records, crop application records, materials receipt, returns, etc. in accordance with regulations and standards set by the company.

Qualifications:

- Two year degree in a food science or agricultural field, or demonstrated experience in agricultural or food production.
- Must be a team player working across functions.
- Ability to communicate frequently and effectively with management and staff.
- Five years' experience managing multiple team members or equivalent experience.
- Strong time management, record keeping, analytical and problem solving skills.
- Working knowledge of regulatory requirements including OSHA regulations, FDA guidelines for food plant operations, food production, cannabis industry standards, etc.
- Proficient in the use of computer software such as Microsoft Excel and Word and the ability to learn new software programs.

- Must be sufficiently proficient in English to read and interpret documents such as safety rules, operating and maintenance instructions, procedure manuals, etc. and write routine reports.
- Must be able to stand and walk on concrete floors, be able to work in a hot and/or humid environment, be able to lift 50 pounds.
- Must have or be able to earn a Florida pesticide applicator license.
- Must be able to wear a respirator and personal protection equipment for pesticide applications.
- Must pass a Level 2 background check.

PROCESSING TECHNICIAN

Reports to: Processing Manager

Job Description: Performs harvest, trimming, drying, curing and any other processing of medicinal cannabis in preparation for extraction operations.

Job Responsibilities: Harvest plants, trim, or prepare for mechanical trimming. Move in/out of drying rooms. Assist cultivation technicians with waste disposal, washing containers, etc. Maintain cleanliness of work area. Follow all SOPs for safe handling, security, etc. Maintain highest quality of the cannabis product.

Qualifications:

- High school diploma or GED required. Must be 21 years old or older.
- Must be a team player working across functions.
- Ability to communicate frequently and effectively with management and staff.
- Proficient in the use of computer software such as Microsoft Excel and Word and the ability to learn new software programs.
- Must be sufficiently proficient in English to read and interpret documents such as safety rules, operating and maintenance instructions, procedure manuals, etc. and write routine reports.
- Must be able to stand and walk on concrete floors, be able to work in a hot and/or humid environment, be able to lift 50 pounds.
- Must pass a Level 2 background check.

RESUMES/BIOGRAPHIES

Chief Executive Officer

ROBERT DUNSTAN WALLACE

15105 NW 94 Ave• Alachua, FL 32615
Phone: 352-219-5825 • E-Mail: chnuts@gmail.com

Education

Bachelor of Science with High Honors - University of Florida 1979 – Interdisciplinary Biology in Zoology, Wildlife Ecology and Botany with Minor in Agricultural Science.

Employment

- Founder and President, Chestnut Hill Tree Farm 1981-2015
- Founder and President, Chestnut Hill Outdoors (wildlife) 2012-2015
- Founder and President, Chestnut Hill Orchards (imported chestnut food products) 2012-2015
- Founder and President, Ponce Inlet Development 2004-2015
- Real Estate Broker, Coldwell Banker Commercial 2010-2015

Publications

- Chestnuts and Building a Commercial Chestnut Industry in the U.S. – authored or consulted on more than 100 publications in various horticultural journals – The Chestnut Grower, Northern Nut Growers Association, Pomona (North American Fruit Explorers), multiple national magazines including Whole Earth News, Mother Earth News, American Fruit Grower, Nursery Manager, etc 1985-2015
- Authored or consulted on 50+ articles in national newspapers on chestnuts – New York Times, Washington Post, etc
- Authored or consulted 20+ publications on Oriental Persimmons – various journals 1990-2015
- Editor Chestnutworks, publication of the Chestnut Growers of America 1985-1992
- Editor and Symposium organizer, Chestnuts and Creating a Commercial Chestnut Industry in the U.S. Symposium of the First International Chestnut Industry Conference, Morgantown WV 1987
- An Introduction to Production, Marketing and Economics of Growing Chestnuts in the SE United States. R.D. Wallace and Dr. PJ Van Blokland. Staff Paper 354. Food and Resource Economics Dept, Institute of Food and Agricultural Sciences, 1989

University of Florida

- Chestnuts - The Best Food Plot Tree – authored or consulted 20+ articles for multiple hunting magazines – North American Whitetail, Bowhunting, Deer and Deer Hunting, Quality Whitetails, Wildlife Management News, Peterson's Bowhunting, etc — 2012-2015

Research Experience

- USDA SBIR Research Grant – Clonal Rooting in Chestnut — 1995
- Bird Species Populations and Island Biogeography in Habitat Islands in North Florida – Florida Game and Fish Commission — 1979-1980

Patents & Trademarks

- U.S. Plant Patents for Revival Chestnut, Willamette Chestnut, Carolina Chestnut and Heritage Chestnut – personally wrote the only patents ever given to Chestnut tree varieties — 1987-1990
- multiple Trademarks including: Dunstan Chestnut ™, Chestnut Magic ™, Our Nuts are Bigger ™, Freedom Flowering Pear ™

Seminars and Media Experience

- How to Attract Deer with Food Plot Trees - Quality Deer Management Association – has done multiple presentations for seminars and Deer Steward Management classes, Archery Trade Association, etc. — 2013-2015
- International Plant Propagation Society – presentations on propagation of hard-to-root tree species — 1998-1999
- 20+ TV appearances on Planting Trees to Attract Wildlife with Food Plot Trees – North American Whitetail TV Show, Whitetail Properties TV Show, Gamekeepers, Woods and Waters TV, Fish and Game TV, etc — 2013-2015
- TV Commercials on Sportsmans Channel, Outdoor Channel, Pursuit Channel

Customers for Trees and Chestnut Products

- For Trees - Walmart, Lowes, The Home Depot, Rural King, Farm King, Co-op Feed Dealers, Stark Bros, etc — 1994-2015
- For Chestnut Magic – Walmart, Cabelas, Tractor Supply, Rural King, Farm King, Mills Fleet Farm, Co-op Feed Dealers, etc
- For Chestnut Food products – Whole Foods Market, United Natural Foods, small gourmet food stores and manufacturers

Affiliations/Memberships

- Chestnut Growers of America (Founder and Board of Director) — 1983-2015
- North American Fruit Explorers — 1983-2015
- Northern Nut Growers Association — 1983-2015
- International Plant Propagation Society — 1994-2002
- Florida Nursery Growers and Landscape Association — 1983-2015
- PK Yonge Developmental Research School Board of Trustees (Founder) — 1995-2014
- Gainesville Community Redevelopment Association Board of Advisors — 2012-2014
- Gainesville Area Innovators Network
- Emergent Growth II Angel Investment Fund, Gainesville FL

Real Estate Development Projects

- Red Oak Estates Subdivision, Alachua FL
- Progress Plaza, Alachua FL
- 1310 Retail Center, Shands Hospital, Gainesville FL

- North Causeway Offices, New Smyrna Beach FL
- Palm Ridge Plaza, The Villages, FL
- Sabal Palm Plaza, The Villages, FL

Interests

- Birding – 790 species seen in North America and 2500 species seen worldwide
- Sport Fishing and Fly Fishing
- Photography
- Travel
- Black Belt in Aikido

Deborah Gaw

15105 NW 94th Ave., Alachua, FL 32615
352-246-3045
dgaw55@msn.com

Professional Profile

Co-owner and CFO of Chestnut Hill Tree Farm, a leader in FL's wholesale tree industry and producer/distributor of a unique line of specialty fruit and ornamental trees for the Southeastern United States since 1983. Experienced horticulturist with a diverse knowledge of plant propagation, production, nutrition and pest management systems. Educator of growing specialty fruit and nut crops throughout the US. Ties with the University of Florida's Environmental Horticulture Department and Fruit Crops Department.

Professional Experience

1986-Present

Built CHTF from its inception in 1983 into one of Florida's leading tree farms.

- Established production systems for bare-root and container grown crops
- Established propagation systems, including seed, cutting and grafting propagation, maintenance of stock material and seed collection
- Introduced a unique cultivar of chestnut tree, which established a new nut crop in the US,along with a number of new fruit and nuts crops. Educates orchardists on crop production and management
- Coordinates retail and wholesale mail order business
- Handled logistics and distribution to large wholesale nursery accounts
- Assists in sales and advertising campaigns
- CFO in charge of all accounting and bookkeeping functions including accounts payable and receivable, tax preparation
- Handles HR and payroll
- Purchaser of equipment and supplies
- Works in cooperation with management and production team to achieve production and sales goals

1983-1986

Biological Assistant, Dept. Of Environmental Horticulture, Univ. of Florida

- Conducted research on post-harvest physiology of a variety of key economic flowering crops, such as poinsettias, azaleas and chrysanthemums for the flora cultural industry
- Knowledge of growing environmentally-controlled flowering crops and researching cultural conditions affecting their longevity, such as lighting, fertilizer and watering regimes
- Statistical analysis of data
- Trained in electron microscopy techniques
- Studied plant breeding
- Knowledge of plant growth regulators and their effects on plant production

1979-1983

Biological Assistant, Dept of Environmental Horticulture, Univ. of Florida

- Managed the Department's Plant Tissue Analysis Laboratory
- Prepared plant leaf samples and reagents under sterile conditions
- Performed nitrogen analysis using kjeldahl extraction method
- Operated and maintained atomic mass spectrometer for micro analysis of key nutritional elements
- Managed a staff of laboratory assistants
- Assisted staff and graduate students in various departmental research projects
- Purchased laboratory supplies/gases and equipment

Education 1976-1978

B.S in Agriculture, University of Florida, Dept. Of Environmental Hort.

1973-1975

Rollins College, pre-med program

Affiliations Chestnut Growers of America

Northern Nut Growers

North American Fruit Explorers

Florida Nursery Growers and Landscape Assoc.

Florida Pomegranate Assoc.

International Plant Propagators Society

Personal Edible Gardening/Cooking

Working Out/Running/Hiking

Traveling the world

SUSAN L. BAUMGARTNER, PHARM.D., MBA

2528 NW 138th Terrace • Gainesville, Florida 32606
678-602-5701 • susan.l.baumgartner@gmail.com

PROFILE

Accomplished business executive with expertise in the successful development and commercialization of pharmaceutical products and medical devices. Outstanding leader and strong performer in all educational and professional endeavors with demonstrated success across key positions within a top-tier pharmaceutical company and technology startups. Excellent communicator with a unique balance of scientific and business expertise, and exceptional active listening and analytical skills. Proven ability to maximize the performance of brands, organizations, operations, and people. Trusted advisor for executive teams, clients, strategic partners, colleagues, advisors, and board members. Breadth of expertise in strategic planning, business development, sales, marketing, operations, regulatory affairs, product development, project management, medical strategies, and scientific affairs. Deep ties to the University of Florida, and engaged in programs to support technology licensing and advancement of technology startups. Dedicated to the successful commercialization and adoption of innovation that makes a difference in health care.

PROFESSIONAL EXPERIENCE

INDEPENDENT CONSULTANT — 2015 – Present

XHALE, INC. — 2011 – 2015

Vice President of Business Development, Gainesville, FL (2011 – 2015)
Key member of the Executive Management Team for Xhale, a privately-funded startup and emerging leader in health monitoring technologies, reporting directly to the CEO and then to the President of Xhale Smart, a wholly-owned subsidiary. Responsible for developing and commercializing an innovative breath-based medication adherence monitoring system.

- Developed corporate strategy and product strategy for a novel medication adherence monitoring technology, and played an instrumental role in moving the company from an idea to a viable business operation.
- Negotiated collaborative development agreements with a top-tier pharmaceutical client resulting in strategic funding, and extracted significant value from this partnership.
- Initiated and developed a critical strategic alliance with a global leader in pharmaceutical formulations and manufacturing.
- Managed regulatory affairs, and led efforts with the U.S. FDA to identify and pursue efficient regulatory pathways for the system consisting of a food additive for inclusion in a pharmaceutical dosage form and a monitoring device for home use.
- Orchestrated sales, marketing, scientific communications, corporate relations, and Advisory Board activities to achieve business, financial, product development, market development, and client goals.
- Engaged pharmaceutical companies, contract research organizations (CROs), the National Institutes of Health (NIH), key opinion leaders, and clinical research service providers to accelerate adoption of the system and accomplish business goals.
- Made pivotal strategic and tactical decisions with respect to business planning, product development, client engagement, regulatory strategy, clinical studies, and pipeline investments that laid the foundation for company growth.

eTECT, LLC — 2010 – 2011

Commercial Lead, Roswell, GA (2010 – 2011)
Senior Commercial Leader for development-stage company with responsibility for orchestrating business development and customer engagement efforts. Developed and implemented strategic and tactical plans to bring to market an innovative medication adherence monitoring system that uses wireless ingestible sensors and a novel in vivo communications platform.

MERCK & COMPANY, INC., UNITED STATES HUMAN HEALTH DIVISION — 1996 – 2010

Senior Director of Commercial Operations, Southeast Commercial Operations Group, Atlanta, GA (2008 – 2010)
Senior Sales Leader with responsibility for directing commercial operations in South Carolina, Western North Carolina, and the Northeast Coast of Georgia. Successfully managed a portfolio of prescription medications in the asthma, allergic rhinitis, diabetes, hypertension, and migraine markets with profit and loss responsibility, annual sales objective of $144 million, and annual operating budget of $8.7 million. Led, coached, and managed a team of two Medical Group Account Managers, four Customer Team Managers, and 48 Customer Representatives.

- Designed new organizational structure and implemented customer-centric commercial model that resulted in 2009 portfolio performance of 102.4% of planned sales objective and #1 Southeast rank on portfolio business results.
- Significantly increased customer trust and value scores, employee engagement scores, and Region culture scores.
- Developed commercial strategy for the Region that streamlined operations, improved productivity, enhanced quality of customer interactions, fostered internal integration, and capitalized on growth opportunities.

MERCK & COMPANY, INC., UNITED STATES HUMAN HEALTH DIVISION

Senior Business Director, **Southeast Business Group,** Atlanta, GA (2006 – 2008)
Senior Sales Leader with responsibility for achieving financial goals, managing customer relationships, and launching three new primary care products in diverse markets within Tennessee, Kentucky, West Virginia, North Carolina, and South Carolina. Successfully managed a portfolio of prescription medications in the asthma, allergic rhinitis, and diabetes markets, as well as vaccines for the prevention of cervical cancer, genital warts, and herpes zoster. Led, coached, and managed a team of eight Business Managers and 92 Sales Representatives.

- Outperformed Fortune 500 best-in-class coaches and Merck peers on coaching effectiveness score.

Director, Strategic Planning and Support, Southeast Business Group, Atlanta, GA (2005 – 2006)
Developed strategic plans for the Southeast Sales Team in partnership with the Vice President and Senior Business Directors to drive annual revenue of $2.4 billion and long-term growth. Provided analytical, operational, and decision support that informed key decisions related to sales strategy, operational excellence, performance management, and resource allocation. Led team of four Region Analysts and one National Technical Analyst. Served as Lead Planner for the diabetes franchise.

Business Manager, Southeast Business Group, Boca Raton, FL (2002 – 2005)
Sales Manager with responsibility for achieving financial goals and managing customer relationships in the dynamic South Florida market. Successfully managed a portfolio of prescription medications in the osteoporosis, asthma, allergic rhinitis, arthritis, analgesia, and dyslipidemia markets. Led, coached, and managed a team of 14 Sales Representatives.

- Achieved final-year performance in the top 10% of Business Managers in the United States.
- Earned 2005 Special Achievement Award for Outstanding Leadership and 2004 Quality Customer Selling Award.

Senior Manager, Medical Strategies Group, Upper Gwynedd, PA (2001 – 2002)

Marketing Manager, Analgesic/Anti-inflammatory Therapeutic Business Group, Upper Gwynedd, PA (1999 – 2001)

- Earned Marketer of the Year, Best Customer Program, Customer Focused, and Field Favorite Awards.

Project Manager, Market Integration Team for VIOXX, West Point, PA (1998 – 1999)

Launch Manager, Market Integration Team for PROPECIA, West Point, PA (1997 – 1998)

- Earned Vice President's Distinguished Service Award.

Cardiovascular Consultant, Southeast Business Group, Jacksonville, FL (1996 – 1997)

EDUCATION

Doctor of Pharmacy, Highest Honors, University of Florida, 1996
Master of Business Administration, University of Florida, 1996

- Perry A. Foote Award for Distinguished Scholarship (Top Graduate in the Doctor of Pharmacy Program)
- Searle Fellowship in Pharmacy, First Place in National Competition
- University of Florida President's Recognition of Outstanding Students Award
- Rho Chi Pharmacy Honor Society, President; Rho Chi Gene Gramling Award for Academics and Leadership
- Eli Lilly Award for Outstanding Leadership, Academics, and Extracurricular Activities
- American Pharmaceutical Association – Academy of Students of Pharmacy Mortar and Pestle Professionalism Award
- Beta Gamma Sigma Business Honor Society

PROFESSIONAL ACHIEVEMENTS

- Director, Xhale Smart Board of Directors (2012 – 2015)
- Co-inventor on provisional patent application for "Improved Self Monitoring and Reporting Therapeutics, SMART®, Medication Adherence Monitoring Method, Device, Compositions of Matter and System" (2014)
- Co-inventor on design patent application for "Miniature Portable Gas Chromatograph" (2013)
- Invited Mentor, Empowering Women in Technology Startups (Ewits®) Program (2012, 2013, 2015)
- Member, National Advisory Board for University of Florida College of Pharmacy (2008 – 2009)
- University of Florida Outstanding Young Alumni Award (2007)
- Commencement Speaker, University of Florida College of Pharmacy Graduation (2000)

R. Dunstan Wallace II Resume

- Graduated with Honors from Buchholz High School Finance Academy 2007
- President of Finance Academy
- Low Brass Captain Buchholz Wind Symphony and Golden Regiment Marching Band
- member of Phantom Regiment Drum Corps marching band summers 2007-2008-2009
- Bachelor's Degree from University of Florida Fisher School of Accounting in the Warrington College of Business Administration 2011
- Intern in Tax Accounting at Austin, Bovay and Gilman CPA - 2010
- Chestnut Hill Tree Farm – 2011-12 - build complete websites and set up shopping carts for www.chestnuthilltreefarm.com and www.chestnuthilloutdoors.com

- Set up Quick Books accounting for website businesses – complete knowledge of Quick Books accounting software 2011-12
- Staff Accountant, University of Florida Accounting Department, Grants Division 2013-14

Age 25.
In Europe for summer 2015, will return August and submit Level 2 Screen (no arrests or tickets).

Security Director

JOHN POWELL

649 WSETBROOK ROAD, DOTHAN, ALABAMA 36303/ 850-491-8886 / jrpowell@graceba.net/ LinkedIn

SUMMARY

An experienced law enforcement and public safety professional with a solid academic foundation who has progressively served at all levels with increasing responsibility and accountability gaining real life experience and professional training. This experience enables effective operations in planning, asset allocation, diversity/gender awareness, personnel management and negotiations, strategic planning, tactical response, organizing, recruiting, budgeting, succession planning and relationship building. Currently certified in Florida as a law enforcement officer.

PROFESSIONAL EXPERIENCE

2011-PRESENT

Law Enforcement, Public Safety/ Security and Management Consultant

Providing professional expertise in the area of law enforcement policy and procedure. Adviser in public safety and security matters. Partnering with the federal, state and local government agencies providing a deep understanding of the issues, organizational protocols and challenges that surround today's law enforcement decision makers. Providing a combination of management consulting, technical expertise, and operational knowledge of law enforcement, public security and management concepts.

- MARICOPA COUNTY, ARIZONA PROTECTIVE SERVICES DEPARTMENT - DIRECTOR. Provide guidance and direction in the operations involving security measures to protect county assets and the public from hostile acts. Provide dignitary protection to elected officials. 75 armed personnel with a $5mil operation budget.

- UNITED NATIONS/UNITED STATES DEPARTMENT OF STATE – Bureau of International Narcotics and Law Enforcement Affairs (INL)/INERNATIONAL POLICE-HAITI. Selected to serve as the US Law Enforcement Contingent Commander (Police Advisor Level V) by the US Department of State and United Nations. National representative of the contingent and, as such, liaise with United States and Haitian national authorities, when appropriate and if possible, on issues pertaining to the betterment of the mission. Responsible for operational control and strategic assignment of all US law enforcement personnel, supervising and managing 100 staff. Ensured all police advisors provide high quality service and conduct themselves in a professional and ethical manner. *U.S. Public Trust clearance required.

- TEXARKANA ARKANSAS SCHOOL DISTRICT INTERIEM SECURITY DIRECTOR to implement safe schools initiative and manage training of security professionals for the school district. Sworn as a Miller County, Arkansas Sheriff's Deputy.

- COMPUTER EVIDENCE SPECIALISTS (CES), Federal Grant assistance and implementation with US Food and Drug Administration.

- ENGILITY CORPORATION-LAW ENFORCEMENT PROFESSIONAL (LEP) – Afghanistan, provided investigative and law enforcement training to the US

Military and Afghanistan National Police. Managed field operations for LEPs. Required US Government Secret Security Clearance.

2009-2011

Director, *FLORIDA DEPARTMENT OF BUSINESS AND PROFESSIONAL REGULATION/Division of Alcoholic Beverages & Tobacco (ABT)*

The of Division of Alcoholic Beverages and Tobacco licenses the alcoholic beverages and tobacco industries, collects and audits taxes and fees paid by the licensees and enforces the laws and regulation of the alcoholic beverage and tobacco industry pursuant to Florida Statutes. Florida has approximately 75,000 active beverage and tobacco license holders. Sworn State of Florida Law Enforcement Position–executive appointment approved by the Governor. Directed the daily operations of three bureaus of the Division; Law Enforcement, Auditing and Licensing.

- Managed 13 statewide regional offices with 337 staff, 155 sworn law enforcement investigators and 182 civilian personnel. Closely developed, managed and monitored a divisional budget of $25 million dollars. Responsible for the collection and accountability of over $1 billion dollars in tax revenue. Ensured Division maintained all standards required for continued accreditation status through the Commission for Florida Law Enforcement Accreditation. Division re-accredited under my tenure.
- Award winning innovative use of technology achieving efficiency. 10% reduction in operational cost without reduction in services to the customer or reduction in staff.
- Served as **Deputy Secretary** for the Florida Department of Business and Professional Regulation under interim appointment, Governor-approved, (2010). Managed and supervised four regulatory agencies; Alcoholic Beverages & Tobacco; Timeshares & Mobile Homes; Hotels & Restaurants; Pari-mutuel Wagering.

1999-2009

Chief of Police

Planed, organized, and directed the law enforcement programs of the City. Work involved responsibility for the protection of life and property through varied programs of enforcement, detection and prevention of crime and traffic accidents, planning and directing emergency response activities. Work also involved a full managerial and supervisory role including the establishment of policy, evaluation and adherence to prescribed standards, planning for and implementing special enforcement activities, preparing special state, federal and local reports, analyzing crime and accident trends, cooperating with other law enforcement and local agencies, budget preparation and management and supervision of all department personnel. Work was performed in accordance with departmental policy and state and federal law.

City of Dothan, Alabama (2005-2009)

- Sworn State of Alabama law enforcement position – Municipal law enforcement department providing service to a diverse community of 67,000

residents. Department of 155 sworn staff and 100 non-sworn personnel providing professional staff to the Patrol, Criminal Investigations and Support Services Divisions. These functions included animal services, radio shop, city jail (129 inmate capacity), municipal court security and emergency communications center. $30 million dollar biennial budget.

City Wilson, North Carolina (2001-2004)

- Sworn State of North Carolina law enforcement position – Municipal law enforcement department providing service to a diverse community of 50,000 residents. Department of 120 sworn staff and 20 non-sworn personnel providing professional staff to the Patrol, Criminal Investigations and Support Services Divisions. $11 million dollar annual budget.

City Hartsville, South Carolina (1999-2001)

- Sworn State of South Carolina law enforcement position – Municipal law enforcement department providing service to a diverse community of 8,000 residents. Department of 40 sworn staff and 10 non-sworn personnel providing professional staff to the Patrol, Criminal Investigations and Support Services Divisions. $2 million dollar annual budget.

Implementation of crime reduction programs such as; National Night Out (National Award winner), Sexual Offender Accountability Program (S.O.A.P.) and Data-driven intelligence led policing using crime analysis and monitoring to identify crime trends and hot spots. Implemented foot and bicycle patrols. Launched departmental accreditation efforts through the Commission on Accreditation for Law Enforcement Agencies (CALEA).

1983-1996 **SWORN LAW ENFORCEMENT OFFICER**

- FBI Special Agent (1996-1999) assigned to white collar crime investigations, violent fugitive felon investigations, and narcotic crimes and served as law enforcement liaison.

- Escambia County Florida Sheriff's Office (1983-1996) served as Corrections Officer, Patrol Officer, Narcotics Investigator, Field Training Officer, Property and Persons Crime Investigator, Robbery and Homicide Investigator. Sheriff's supervisor, SWAT operator / team leader.

EDUCATION | CURRENT CERTIFICATIONS

1994 MS, Public Administration, *Troy University*

1992 BS, Criminal Justice/minor in Business, *Troy University*

1990 AS, General Studies, *Troy University*

Florida Law Enforcement Certification (current); Florida Certified Insurance Adjuster (current). Previous Adjunct instructor in Criminal Justice and Management – George Stone Technical School (Florida law enforcement academy), Texas A&M, Coker College, Hartsville, S.C., Florence/Darlington Technical College, S.C., Barton College, Wilson, N.C., and Troy University, Dothan, AL.

PROFESSIONAL TRAINING:

FBI Academy (96–19); FBI Law Enforcement Executive Development Seminar (LEEDs Session 59); FBI Southeastern Law Enforcement Executive Development Seminar; FBI Carolina Command College; Florida Department of Law Enforcement Chief Executive Seminar (FDLE) (Class 43); Anti-Defamation League (ADL) Advanced Training; University of Virginia Weldon-Cooper Center for Public Service Senior Executive Institute (SEI); University of Arkansas Rural Executive Management Institute; NIMs certifications; Incident Command (ICS); Emergency Management.

CODI COLEMAN

odicoleman4@gmail.com

Summary:

I have been working with and growing cannabis for six years. During the first three years, I had the opportunity to work under several mentors while maintaining large-scale outdoor grow sites. Additionally, I have managed multiple departments in cultivation and processing facilities, managing and directing employees and overseeing all aspects of day-to-day operation. In the past three years, I have become self-employed by maintaining patients and owning and operating a private medical cultivation facility.

Education:

I have attended the cannabis-affiliated Oaksterdam University, where I graduated from both the basic and advanced seminars.

Summary of Skills:

- Cannabis garden design, set up and irrigation
- In house propagation, maintaining a stock plants as well as taking clones or cuttings.
- Selective breeding processes
- Nutrients and additives to promote vegetative and flower growth, I prefer using only organic materials in my garden.
- Recognizing pests and diseases common to cannabis plants and how to combat them.
- Constructing a light deprivation house to produce off season crops or use supplementary lights to prolong the vegetation period.
- Multiple pruning, trellising and training techniques.
- Tagging and labeling everything from seed to harvest.
- Good agricultural practices including not over fertilizing or stripping the mineral content from the surrounding land.
- The microbial life needed to promote healthy soil food web
- Organic chemistry of cannabis and cannabinoids.
- Multiple forms of cannabinoid extractions, one in which I excel is butane extraction producing a pristine glass like product.
- Also I have recently started a medical and recreational cannabis garden consultation business, Simple Leaf Solutions LLC, where I assist new comers with design, set up, maintenance and harvest.

Richard Tempel, MD, FACEP. FAAEM

1350 Celebration Avenue
Celebration, FL 34747
407-756-3717
drtempel@gmail.com

EDUCATION

2003 – 2006	Duke University Emergency Medicine Residency Program, Chief Resident
1999 – 2003	University of Maryland School of Medicine, Medical Doctorate
1996 – 1999	University of Maryland College Park, Bachelors of Science in General Biology
1994 – 1996	Towson University, premedical curriculum

EMPLOYMENT

November 2008 – present	Florida Emergency Physicians Ultrasound Coordinator, Florida Hospital Celebration 2009-11
June 2006 – November 2008	Emergency Physician, Saint Joseph Medical Center, Towson, MD Osler Drive Emergency Physician Asociates (ODEPA)
November 2006 – Nov 2008	Emergency Physician, Ultrasound Director Upper Chesapeake Health System

ACADEMIC APPOINTMENTS

Clinical Preceptor, Broward Health/NOVA Family Medicine Residency Program
University of Central Florida (UCF), College of Medicine, volunteer faculty

LICENSURE AND CERTIFICATIONS

American Board of Emergency Medicine (ABEM), June 2007
State of Florida Medical Licensure
Aesthetic Medical Educators Training, Inc., Botulinum Toxin and Dermal Fillers

PUBLICATIONS

1999 Teleradiology in urology: effect of varying compression algorithms on clinical decision making. Abstract. Engineering and Urology Society 14th Annual Meeting. Dallas, TX.

2006 *Infectious Disease in a disaster zone*. Disaster Medicine. Ciottone editor. Section 4, Chapter 46. Mosby. March 2006. ISBN:0323032532

2006 Proposing short-term observation for the disposition on patients with decompression illness; UHMS, Vol 35, No 2, June 2006.

AWARDS AND HONORS

Chief Resident, Division of Emergency Medicine, Department of Surgery, DUMC, 2005-06
Graduating Resident of the Year 2006, Duke University Medical Center
Teaching Resident of the Year, 2006, Duke University Medical Center
Golden Key National Honor Society, University of Maryland College Park, 1998-99
Citation in Archaeology, University of Maryland College Park, 1999

LECTURES/PRESENTATIONS

1/8/2015 - *Controlled Dangerous Substances and Medicinal Marijuana*. Celebration, FL
6/25/2009 – *Allergy and Anaphylaxis.* Florida Emergency Medicine Residency Conference. Orlando, FL
5/28/2009 – *Electrolyte Disorders*. Florida Emergency Medicine Residency Conference. Orlando, FL
11/22/2008 – *Introduction to Emergency Ultrasound.* Lecture, 2008 Radiology Forum, Upper Chesapeake Medical Center. Bel Air, MD
1/ 2005 - Instructor, Duke University Physician Assistant Program, Lecture titles, *Shock* and *ENT Emergencies.*
June 2005/2006 - Disaster Planning Coordinator/Group leader, Duke University Disaster Medicine Intercession, Table top coordinator.
10/18/2004 - ACEP Scientific Assembly; San Francisco, CA. Proposing short-term observation for the disposition of patients with decompression illness: abstract.
3/1/2004 - National Association of Community Health Centers Inc. 2004 Community Health Forum; Orlando, FL. Titles; 'The Importance of Preventive Medicine' and 'Americorp Career Fair: Medicine'

PROFESSIONAL ORGANIZATIONS

Fellow of the American College of Emergency Physicians (ACEP), Florida Chapter
Fellow of the American Academy of Emergency Medicine (AAEM)
American Medical Association, Florida Chapter (FMA)

Curriculum Vitae
Lawrence B. Erlich, M.D.

Lawrence B. Erlich, M.D.

1530 Celebration Blvd.
Suite 406
Celebration, Florida 34747

(407) 852-8882
(407) 830-5252

Specializing in:

General,
Forensic
and
Addiction
Psychiatry

CERTIFICATIONS:

1974 - American Board of Psychiatry and Neurology and Psychiatry
1990 - American Board of Quality Assurance and Utilization Review Physicians
1991 - American Society of Addiction Medicine
1993 - Medical Review Officer Certification Council
1994 - American Board of Psychiatry and Neurology added Qualifications in Forensic Psychiatry
Re-certified 2007
1996 - American Board of Psychiatry and Neurology added Qualifications in Addictions Psychiatry
Re-certified 2007
2001 - Substance Abuse and Mental Health Services Administration federal waiver to prescribe Suboxone
2007 - Re-certification in Forensic Psychiatry and Addiction Psychiatry

FELLOWSHIPS:

1977 - Distinguished Life Fellow of the American Psychiatric Association
1978 - Fellow-American Academy of Forensic Sciences
1988 - Fellow-American College of Medical Quality

ACADEMIC APPOINTMENTS:

1994 - 1996 - Professor of Criminal Justice and Legal Studies at the University of Central Florida
1979 - 1987 - Clinical Assistant Professor of Psychiatry, Robert Wood Johnson Medical School, Piscataway, New Jersey

AWARDS:

1959 - Phi Beta Kappa Academic Honor Society
1963 - Alpha Omega Alpha Medical Honor Society
1971 - Henry P. Laughlin Award for being the
1976 - Award for Service
1982 - Award of Merit
1983 - Award of Merit
1987 - Award for Service
1995 - Award for Service from the Altamonte Springs, Florida Police
2000 - Award for Honorable Mention from the American Psychiatric Association for the 2000 Newsletter of the Year Award competition for the Newsletter of the State of Louisiana

PROFESSIONAL SOCIETIES:

1976 – 1979 - President, South Jersey Psychiatric Association
1978 - 1979 - Chairman, Psychiatric Section, American Academy of Forensic Sciences
1979 – 1981 - Executive Committee, American Academy of Forensic Sciences
1973 - 1982 - Numerous Committees of the New Jersey Psychiatric Association as member and chairman
1977 - 1979 - Secretary, New Jersey Psychiatric Association
1979 - 1980 - Executive Committee, Camden County Medical Society
1979 - 1981 - Vice President for Internal Affairs, New Jersey Psychiatric Association
1981 - 1982 - President Elect, New Jersey Psychiatric Association
1982 - 1983 - President, New Jersey Psychiatric Association
1988 - Present - Member of The American Society of Addiction Medicine
1988 - Present - Fellow of the American College of Medical Quality

CHRONOLOGY :

1955 - 1959 - B.A. in Chemistry, College of the University of Pennsylvania, Philadelphia, Pennsylvania
1959 - 1963 - M.D., Medical School of the University of Pennsylvania, Philadelphia, Pennsylvania
1963 - 1964 - Internship, Kings County Hospital, Seattle, Washington

1964 - 1965 - Residency in General Practice, Mountain View General Hospital, Tacoma, Washington
1965 –1966 - Attending, Student Health Service, University of Florida, Gainesville, Florida
1966 - 1968 - United States Navy - General Medical Officer
1968 – 1971 - Residency in Psychiatry, Institute of the Pennsylvania Hospital, Philadelphia, Pennsylvania
1976 – 1977 - Special Fellowship in Forensic Psychiatry, University of Pennsylvania, Philadelphia, Pennsylvania
1971 - 1987 - Private Practice of Psychiatry Philadelphia, Pennsylvania and Cherry Hill, New Jersey
1983 - 1984 - Attending, The New Jersey Hospital for the Criminally Insane, Vroom Building, Trenton, New Jersey
1987 - 1989 - Florida Psychiatric Associates, Winter Park, Florida
1989 – 1995 - Private Practice Altamonte Springs, Florida
2000 – 2002 - Behavioral Health, Winter Haven Hospital
1971 - Present - Private Practice of Addiction Medicine in Addiction Units (The Institute of the Pennsylvania Hospital and Florida Hospital) and in general hospital units (Our Lady of Lourdes Hospital and Cooper Hospital, Camden, New Jersey)
2011- Present - Founder and Medical Director of Comprehensive Behavioral Healthcare of Central Florida, Celebration, Florida

MEDICAL STAFF APPOINTMENTS :

1988 – 1995 - Consulting, Winter Park Memorial Hospital, Winter Park, Florida
1987 – 1995 - Attending Physician, Florida Hospital, Orlando, Altamonte Springs and Apopka
1971 – 1987- Attending, Our Lady of Lourdes Medical Center, Camden, New Jersey
1986 – 1987- Chief of Psychiatry, Our Lady of Lourdes Medical Center, Camden, New Jersey
1971 - 1987 - Attending, Institute of the Pennsylvania Hospital, Philadelphia, Pennsylvania
1973 - 1980 - Attending, Cooper Medical Center, Camden, New Jersey
1977 - 1979 - Acting Chief of Psychiatry, Cooper Medical Center, Camden, New Jersey
1975 - 1987 - Consultant, Deborah Heart and Lung Center, Browns Mills, New Jersey
1980 - 1982 - Consultant, The Forensic Hospital of the State of New Jersey, Vroom

Building, Trenton, New Jersey

1981 - 1985 - Consultant, St. Lawrence Rehabilitation Center, Lawrenceville, New Jersey

1986 - 1987 - Consultant, North Princeton Developmental Center, Skillman, New Jersey

1995 - 2000 - Attending, Baton Rouge Medical Center, Baton Rouge. Louisiana

1995 - 2000 - Meadow Wood Hospital, Baton Rouge, Louisiana

MEDIA APPEARANCES:

1988 to 1995 - Various appearances on various topics on local television news programs, Orlando, Florida

PUBLICATIONS: 1977-1993

1977 - 1979 - Editor of the Newsletter, New Jersey Psychiatric Association

1979 - Medical-Legal Digest for New Jersey Psychiatrists, New Jersey Psychiatric Association, Chapter 16 –Civil Rights of Mental Patients

1992 - November - Letter to the Editor concerning costly delays in the Workers' Compensation System

1987 - The New Jersey Trial Lawyer, Fall Issue –Psychic Trauma Secondary to the Death of a Child

1991 - The New Jersey Trial Lawyer, March Issue –Stress Management for Executives

1993 - Newsletter of the Florida Association of Self-Insured

PUBLICATIONS: SINCE 1997

1997 - July - Book Review of Karch, "The Pathology of Drug Abuse." Journal of Forensic Sciences, Volume 42, #4.

1997 - April - Book Review of Hickley, "Goodbye My Little Ones" AAAP Newsletter, Volume XII, #2,

1997 - September - Book Review of Sederer, "Outcomes Assessment in Clinical Practice, Journal of Forensic Sciences, Volume 42, #5.

1998 - Book Review of Elyn and Behnke, Jekyll and Trial, (Multiple Personality Disorder and Criminal Law), American Journal of Medical Quality, Volume 12, #1, Spring

1998 - November - Book review of Blane, Brunner, and Wilkinson, "Health and Social Organization" JAMA

1998 - National Institute on Drug Abuse

1999 - January - Book review of Wetherington, Cora Lee and Roman, Aeele B., Newsletter of the American Academy of Addiction Psychiatry

2001 - *A Textbook of Forensic Addiction Psychiatry and Medicine.* Erlich, Lawrence B., M.D., Charles C. Thomas, LDT. Springfield, Illinois

2004- April- JAMA Book review, Principals and Practice of Forensic Psychiatry, edited by Richard D. Rosner, Oxford University Press

PRESENTATIONS :

2001 - July 11-15, Employment Law Trial Skills, Stetson University College of Law, Office of Continuing Legal Education,

2001 - November 23, Certification of Instructor Approval, Florida Department of Insurance, #1076333/CE011

2002 - April 8 - 10, Florida Society of Addiction Medicine Annual Meeting, lecture on Forensic Addiction Medicine

2002 - June 14, The Academy of Florida Trial Lawyers, Lectures on the use of pain practitioners in trial law

2002 - July 7, American Society of Addiction Medicine, Course on Forensic Addiction Medicine, Lecture on Dr. Erlich's book

Brady Thomas Blake

T: 321-239-3162
E: bblake22@hotmail.com

Education

Bachelor of Science, Business Administration — Graduated August 2003
University of Central Florida, Orlando, Florida

Employment

3D Cannabis Center — 2014 - Present
-Facility Grow Manager

- Created procedures to increase and streamline production
- Trained new hires on proper inventory and storage practices

-Consultant

- Helped facilitate the transition to recreational sales
- Developed and trained processes to ensure compliance with city and state law

Colorado Alternative Medicine — **2010 - 2014**
-Senior Operations — 2013 - 2014
-Facility Manager/ Lead Grower — 2013 - 2014

- Implemented and managed daily processes and procedures for 240,000 watts of flower production
- Ensured all employees followed compliance guidelines provided by the MMED
- Inventoried and monitored 4,000 plants daily from clone to harvest using METRC tracking
- Increased production by 30%

-Quality Control/ Harvest Manager — 2010- 2014

- Trained and managed 5-15 trimmers
- Ensured all product was processed to the highest standard of quality
- Confirmed proper packaging, inventory and storage for 60-100lbs. of product monthly

-Lead Trimmer — 2010 – 2010

- Efficiently manicured high quality flower
- Recorded and informed management of daily production

E & A Enterprises — 2009
-Service Technician

- Restaurant equipment service and repair
- Gas, electric, plumbing, and general repair
- Maintained multiple T.G.I. Friday's restaurants in one of their largest markets.
- Provided around the clock emergency repair work

BAGS Inc. — **May 2005– Sept. 2008**
-Account Manager, Disney's All Star Resorts — Oct. 2007– Sept. 2008
Bell Services/ Resort Airline Check-in

- Upheld a seamless participant relationship with Disney management

- Trained and monitored guest service at all three All Star Resorts
- Collaborated with the Disney Magical Express team, major airlines and airports to recover lost luggage
- Completed weekly schedules for 50-60 employees
- Coordinated arrival and departure assistance for many large groups

-Account Manager, Disney's Pop Century Resort Jan. 2007– Oct. 2007
Bell Services/ Resort Airline Check-in

- Initiated and led the luggage department upon BAGS Inc. becoming a Disney participant
- Trained and placed opening team
- Maintained a staff of 2-3 shift managers and 40 employees

-Area Manager, Disney World Resorts Sept. 2005 – Jan. 2007
Resort Airline Check-in

- Managed several zones at all 19 Disney World Resorts
- Traveled six weeks to Denver to assist in opening two remote airline check-in stations at the Hyatt Regency & Grand Hyatt

-Ground Security Coordinator, Disney's Animal Kingdom Lodge May 05'–Sept. 05'
Resort Airline Check-in

- Supervised daily operation
- Ensured all agents followed Security Directives provided by the TSA

Hollister Co. Feb. 2004 - April 2005
-Assistant Store Manager, Altamonte Mall

- Brought store to a regional low shrink rate of 1.6%
- Traveled to provide support for stores in Ocoee, Naples and Tampa, Florida
- Recruited staff and held group interviews

Achievements

Vice President of Recruitment, Sigma Phi Epsilon Fraternity Fall 2000 – Spring 2001
Dean's List, University of Central Florida
Intramural Champion UCF: flag football, soccer, softball, & floor hockey

Samuel Glucksman, DPM

Samuel Glucksman, DPM, the crop management specialist and primary account manager at Glades Crop Care, Inc. currently directs all cultivation operations for the East coast and Homestead divisions. With an extensive educational background in horticulture, receiving a B.S. in botany and PhD in plant medicine from the University of Florida, his continuing experience in the agriculture industry has led him to be a skilled expert and frontrunner in the cultivation and research of diverse plants. He has successfully developed detailed protocols for company operations from diligent field research, providing growers with the best possible organic and conventional recommendations to solve pest, disease, and cultural issues (i.e. pesticide application, etc.). He has directed environmental controls and pest management, providing help to individual's growing issues. Additionally, Dr. Glucksman is an expert in good agricultural practices, and heads the human resources, administrative, and customer service departments at Glades Crop Care, Inc.

A seasoned and researched cultivator and superintended in the horticulture industry, Dr. Glucksman's successful career has provided him with vast regional knowledge. Dr. Glucksman is considered a leader in the agriculture industry in Florida resulting from years of research and experience growing and harvesting crops in the State. His roles in the industry have ranged from a field technician and graduate assistant at the University of Florida, to the assistant field studies coordinator and crop management specialist at Glades Crop Care, Inc.

Dr. Glucksman's established knowledge and long-term involvement in the scientific field enables him to bridge production optimization and research enhancements in plant medicine to the cannabis cultivation industry. Years of progressive experience in the field cause Dr. Glucksman to bring valuable scientific research and advisory services to the company. Dr. Glucksman will be an important asset in the development of the company's fundamental and compliant production practices.

Kristopher M. Palmer

1424 S Urban Way
Lakewood, CO 80228
Phone: (407) 341-8049
E-mail: kpsurfer20@aol.com

Summary

I have built and operated gardens from single warehouse sites up to a 190,000 watt operation with two different production sites, totaling approximately 18,000 sq. ft. I have over 13 years experience with hydroponics such as deep-water culture, flood and drain, top feed and nutrient flow technology. The typical mediums used have been coco, soil, rock wool and grow stones. I also have over 5 years experience with aeroponics and commercial growing operations in Colorado. Thru the years, I have had the ability to consult multiple other gardens. I believe these experiences have helped broaden my understanding of efficiently designing a system based on the building setup. I have had the advantage of helping multiple gardens deal with costly problems that could have been avoided by proper setup and design. My most valuable assets are my knowledge of costs associated with the industry and the ability to design a production facility that also focuses on the reduction of man hours and efficiently staging of materials for the various stages of growth. I have been in the construction industry for over 18 years, which allows me to bridge a major gap between builders and what growers actually need.

Education

University of Central Florida	Orlando, Florida
Bachelor of Science:	Business Administration
Major: Finance	Minor: International Business
Graduated May 2004	Member of Golden Key Honor Society

Licenses/Certifications

Florida Real Estate License

Infrared Training Center-Nationally Certified Thermographer

Professional Experience

THConsulting **2010-Present**
Owner

- Provide services to the rapidly growing medical cannabis industry from state and local application work and cultivation design to build outs and operational staffing and training
- Working with Denver Water and the Denver Department of Environmental Health to develop a best practice guide for commercial cannabis cultivation
- Application of thermal imaging to improve garden and building efficiencies
- Regular participant in control experiments to test various fertilizers on cannabis, both organic and synthetic
- Thousands of hours and dollars in product testing and product development specific to indoor cultivation and hydroponics
- Developed an integrated pest management program over 5 years of commercial cannabis cultivation, updating the program every few months for pests and diseases typical to cannabis, as new products and information become available

3D Cannabis Center **2013-2015**
Investor/Head Grower/Facility Manager

- Created an employee manual specific to the commercial cannabis industry
- Created a cultivation training manual for employees specific to indoor hydroponic systems with a focus on sanitation, grow medium preparation and production planning
- Streamlined inventory ordering and incorporated regular bi-weekly material deliveries reducing the inventory storage area and man hours associated with acquiring necessary cultivation materials
- Increased the indoor production/cultivation area by 100% in less than 10 months
- Increased production by over 300% in less than 12 months
- Increased staff from 5 to 35 employees in 8 months
- Increased sales from $30,000 to $300,000 per month in 8 months
- Responsible for working with the City of Denver's Building and Zoning Department in securing the 7th recreational license awarded in Colorado which resulted in America's first recreational sale

Colorado Alternative Medicine **2010-2013**
Head Grower/Facility Manager

- Hired as the first cultivation employee/manager with the full responsibility of the development of the cultivation department
- Developed commercial hydroponic systems designed for automation, man hour reduction and ease of operation
- Designed and built all production rooms throughout a multiple warehouse cultivation expansion
- Increased production by over 400% in a 2 ½ year period
- Created processes and procedures for daily operations and production planning
- Created training methods to organize and streamline production methods
- Trained management in equipment diagnostics and general system troubleshooting
- Performed evaluations, data collection and analysis of over 150 varieties of cannabis over a 3 year period

Absolute Property Managers **2008-2009**
Owner

- Managed and maintained residential and commercial properties
- Performed basic services all the way to whole house remodels
- Performed thermal energy efficiency evaluations on residential homes
- Incorporated use of the thermal camera to effectively provide condition monitoring of commercial electrical and mechanical systems

E & A Enterprises **2006-2009**
Service Technician

- Repaired and serviced restaurant equipment
- Repaired gas, electric, plumbing, and miscellaneous issues
- Maintained multiple T.G.I. Friday's restaurants in one of their largest markets
- Provided around the clock emergency repair work

O2HR Human Resources **2004-2005**
Account Executive

- Outside Sales- position was to seek out and obtain a new book of business through cold calls and creative marketing
- Customer Sales- provided after the sale service to maintain client base and improve on referral business

Construction Experience

Nationally Certified Thermographer **6 years**

- Scanned and identified heat losses and heat sources
- Scanned electrical systems to ensure safe operating conditions
- Performed air flow calculations
- Performed building energy efficiency evaluations and condition monitoring of mechanical systems

Restaurant Repair/Property Management/General Contractor **18 years**

- Commercial gas line repair
- Metal working/Fabrication experience
- Carpentry experience
- Plumbing experience
- Commercial electrical experience
- A/C & Ventilation experience

This Consulting Agreement, dated effective March 1, 2015 (this “Agreement”), is made and entered into by and among Chestnut Hill Tree Farm (the “Company”) and From Seed (the “Consultant”).

ARTICLE 1 SCOPE OF WORK

1.1 Services. The Company has engaged Consultant to provide services in connection with the Company’s application for low THC cannabis and facility design and operation. Consultant will initially provide content necessary for the Florida application. We will use our collective experiences to add detail to the cultivation plan and assist in equipment selection and design.

1.2 Time and Availability. Consultant will devote the time necessary to assist in the application process for the Company as stated herein. Consultant shall have discretion in selecting the dates and times it performs such consulting services giving due regard to the needs of the Company’s business.

1.3 Confidentiality. In order for Consultant to perform the consulting services, it may be necessary for the Company to provide Consultant with Confidential Information (as defined below) regarding the Company’s business and products. The Company will rely heavily upon Consultant’s integrity and prudent judgment to use this information only in the best interests of the Company.

1.4 Standard of Conduct. In rendering consulting services under this Agreement, Consultant shall conform to high professional standards of work and business ethics. Consultant shall not use time, materials, or equipment of the Company without the prior written consent of the Company. In no event shall Consultant take any action or accept any assistance or engage in any activity that would result in any university, governmental body, research institute or other person, entity, or organization acquiring any rights of any nature in the results of work performed by or for the Company.

1.5 Reports. Consultant shall periodically provide the Company with written reports of his or her observations and conclusions regarding the consulting services. Upon the termination of this Agreement, Consultant shall, upon the request of Company, prepare a final report of Consultant’s activities.

ARTICLE 2 INDEPENDENT CONTRACTOR

2.1 Independent Contractor. Consultant is an independent contractor and is not an employee, partner, or co-venturer of, or in any other service relationship with, the Company. The manner in which Consultant’s services are rendered shall be within Consultant’s sole control and discretion. Consultant is not authorized to speak for, represent, or obligate the Company in any manner without the prior express written authorization from an officer of the Company.

2.2 Taxes. Consultant shall be responsible for all taxes arising from compensation and other amounts paid under this Agreement, and shall be responsible for all payroll taxes and fringe benefits of Consultant’s employees. Neither federal, nor state, nor local income tax, nor payroll tax of any kind, shall be withheld or paid by the Company on behalf of Consultant or his/her employees. Consultant understands that he/she is responsible to pay, according to law, Consultant’s taxes and Consultant shall, when requested by the Company, properly document to the Company that any and all federal and state taxes have been paid.

2.3 Benefits. Consultant and Consultant's employees will not be eligible for, and shall not participate in, any employee pension, health, welfare, or other fringe benefit plan of the Company. No workers' compensation insurance shall be obtained by Company covering Consultant or Consultant's employees.

ARTICLE 3 COMPENSATION FOR CONSULTING SERVICES

3.1 Reimbursement. The Company agrees to reimburse Consultant for all actual reasonable and necessary expenditures, which are directly related to the consulting services. These expenditures include, but are not limited to, expenses related to travel (i.e., airfare, hotel, temporary housing, meals, parking, taxis, mileage, etc.), telephone calls, and postal expenditures. Expenses incurred by Consultant will be reimbursed by the Company within 15 days of Consultant's proper written request for reimbursement.

ARTICLE 4 TERM AND TERMINATION

4.1 Term. This Agreement shall be effective as of March 1st, 2015, and shall continue in full force and effect for 12 consecutive months. The Company and Consultant may negotiate to extend the term of this Agreement and the terms and conditions under which the relationship shall continue.

4.2 Termination. The Company may terminate this Agreement for "Cause," after giving Consultant written notice of the reason. Cause means: (1) Consultant has breached the provisions of this Agreement in any respect, or materially breached any other provision of this Agreement and the breach continues for 30 days following receipt of a notice from the Company; (2) Consultant has committed fraud, misappropriation, or embezzlement in connection with the Company' s business; (3) Consultant has been convicted of a felony; or (4) Consultant's use of narcotics, liquor, or illicit drugs has a detrimental effect on the performance of his or her employment responsibilities, as determined by the Company.

4.3 Responsibility upon Termination. Any equipment provided by the Company to the Consultant in connection with or furtherance of Consultant's services under this Agreement, including, but not limited to, computers, laptops, and personal management tools, shall, immediately upon the termination of this Agreement, be returned to the Company.

ARTICLE 5 CONFIDENTIAL INFORMATION

5.1 Obligation of Confidentiality. In performing consulting services under this Agreement, Consultant may be exposed to and will be required to use certain "Confidential Information" (as hereinafter defined) of the Company. Consultant agrees that Consultant will not and Consultant's employees, agents, or representatives will not use, directly or indirectly, such Confidential Information for the benefit of any person, entity, or organization other than the Company, or disclose such Confidential Information without the written authorization of the President of the Company, either during or after the term of this Agreement, for as long as such information retains the characteristics of Confidential Information.

5.2 Definition. "Confidential Information" means information not generally known and proprietary to the Company or to a third party for whom the Company is performing work, including, without limitation, information concerning any patents or trade secrets, confidential or secret designs,

processes, formulae, source codes, plans, devices or material, research and development, proprietary software, analysis, techniques, materials, or designs (whether or not patented or patentable), directly or indirectly useful in any aspect of the business of the Company, any vendor names, customer and supplier lists, databases, management systems and sales and marketing plans of the Company, any confidential secret development or research work of the Company, or any other confidential information or proprietary aspects of the business of the Company.

ARTICLE 6 RIGHTS AND DATA

All drawings, models, designs, formulas, methods, documents, and tangible items prepared for and submitted to the Company by Consultant in connection with the services rendered under this Agreement shall belong exclusively to the Company and shall be deemed to be works made for hire (the "Deliverable Items"). To the extent that any of the Deliverable Items may not, by operation of law, be works made for hire, Consultant hereby assigns to the Company the ownership of copyright or mask work in the Deliverable Items, and the Company shall have the right to obtain and hold in its own name any trademark, copyright, or mask work registration, and any other registrations and similar protection which may be available in the Deliverable Items.

ARTICLE 7 CONFLICT OF INTEREST AND NON-SOLICITATION

7.1 Non-Solicitation. Consultant covenants and agrees that during the term of this Agreement, Consultant will not, directly or indirectly, through an existing corporation, unincorporated business, affiliated party, successor employer, or otherwise, solicit, hire for employment or work with, on a part-time, consulting, advising, or any other basis, other than on behalf of the Company any employee or independent contractor employed by the Company while Consultant is performing services for the Company.

ARTICLE 8 RIGHT TO INJUNCTIVE RELIEF

Consultant acknowledges that the terms of this Agreement are reasonably necessary to protect the legitimate interests of the Company, are reasonable in scope and duration, and are not unduly restrictive. Consultant further acknowledges that a breach of any of the terms of this Agreement will render irreparable harm to the Company, and that a remedy at law for breach of the Agreement is inadequate, and that the Company shall therefore be entitled to seek any and all equitable relief, including, but not limited to, injunctive relief, and to any other remedy that may be available under any applicable law or agreement between the parties. Consultant acknowledges that an award of damages to the Company does not preclude a court from ordering injunctive relief. Both damages and injunctive relief shall be proper modes of relief and are not to be considered as alternative remedies.

ARTICLE 9 GENERAL PROVISIONS

9.1 Construction of Terms. If any provision of this Agreement is held unenforceable by a court of competent jurisdiction, that provision shall be severed and shall not affect the validity or enforceability of the remaining provisions.

9.2 Governing Law. This Agreement shall be governed by and construed in accordance with the internal laws (and not the laws of conflicts) of the State of Florida.

9.3 Complete Agreement. This Agreement constitutes the complete agreement and sets forth the entire understanding and agreement of the parties as to the subject matter of this Agreement and supersedes all prior discussions and understandings in respect to the subject of this Agreement, whether written or oral.

9.4 Dispute Resolution. If there is any dispute or controversy between the parties arising out of or relating to this Agreement, the parties agree that such dispute or controversy will be arbitrated in accordance with proceedings under American Arbitration Association rules, and such arbitration will be the exclusive dispute resolution method under this Agreement. The decision and award determined by such arbitration will be final and binding upon both parties. All costs and expenses, including reasonable attorney's fees and expert's fees, of all parties incurred in any dispute that is determined and/or settled by arbitration pursuant to this Agreement will be borne by the party determined to be liable in respect of such dispute; provided, however, that if complete liability is not assessed against only one party, the parties will share the total costs in proportion to their respective amounts of liability so determined. Except where clearly prevented by the area in dispute, both parties agree to continue performing their respective obligations under this Agreement until the dispute is resolved.

9.5 Modification. No modification, termination, or attempted waiver of this Agreement, or any provision thereof, shall be valid unless in writing signed by the party against whom the same is sought to be enforced.

9.6 Waiver of Breach. The waiver by a party of a breach of any provision of this Agreement by the other party shall not operate or be construed as a waiver of any other or subsequent breach by the party in breach.

9.7 Successors and Assigns. This Agreement may not be assigned by either party without the prior written consent of the other party; provided, however, that the Agreement shall be assignable by the Company without Consultant's consent in the event the Company is acquired by or merged into another corporation or business entity. The benefits and obligations of this Agreement shall be binding upon and inure to the parties hereto, their successors and assigns.

9.8 No Conflict. Consultant warrants that Consultant has not previously assumed any obligations inconsistent with those undertaken by Consultant under this Agreement.

IN WITNESS WHEREOF, this Agreement is executed as of the date set forth above.

[COMPANY] [CONSULTANT]

By: _____ From Seed LLC By: _____ Chestnut Hill Tax Farm

Its: 6-30-15 Its: Partner

6/15/15

Donn M. Dennis, MD

Donn Dennis is the JS Gravenstein MD Endowed Professor of Anesthesiology at the University of Florida's Department of Anesthesiology. He currently teaches medical courses in anesthesiology, pharmacology, and experimental therapeutics. He is the Director of Nanomedicine and Co-Director at the Center for Nano-Bio Sensors. Dr. Dennis will serve as a medical doctor advocate for all the executive members of the company, with particular emphasis on cannabis research and development for patient use. An expert in the medical research field, Dr. Dennis received his education from three prominent establishments, completing his residency in anesthesiology and a research fellowship in cardiovascular pharmacology and electrophysiology at the University of Florida College of Medicine, finishing his internship at William Beaumont Hospital in Royal Oak Michigan, and receiving his Doctorate Degree from the University of Michigan in Ann Arbor.

Dr. Dennis's clinical interests include: translational research, nanomedicine, drug research and development. Within his role in the company, he will explore new ways to provide helpful patient and caregiver education, while researching new advances in the medicinal cannabis field. Dr. Dennis is a strong believer that education is a powerful way to initiate progressive changes in the world, including health and health care in our society.

Fwd: Thank you!

1 message

Tue, Jul 7, 2015 at 4:57 PM

Sent from my iPhone

Begin forwarded message:

From: chnuts@gmail.com
Date: June 18, 2015 at 4:02:10 PM EDT
To: Mark John Rice <mark.j.rice@vanderbilt.edu>
Subject: Fwd: Thank you!

Sent from my iPhone

Begin forwarded message:

From: Susan Baumgartner <susan.l.baumgartner@gmail.com>
Date: June 18, 2015 at 1:55:59 PM EDT
To: Robert Wallace <chnuts@gmail.com>
Subject: Fwd: Thank you!

We can discuss later.
Susan

---------- Forwarded message ----------
From: Dennis,Donn M <ddennis@anest.ufl.edu>
Date: Thu, Jun 18, 2015 at 11:36 AM
Subject: RE: Thank you!
To: Susan Baumgartner <susan.l.baumgartner@gmail.com>

Dear Susan,

It was great catching up with you too on Monday. Per our discussion, this Email will confirm my willingness to serve on the Chestnut Hill Ad Board to provide input on developing low THC content versions of cannabinoids for various medical applications, pending Chestnut Hill's securing a license from the State of Florida, my getting approval from the University in terms of the Conflict of Interest (COI) process, and final execution of a consulting agreement.

I look forward to working closely with you, Bob, and the rest of the Chestnut Hill team on this

interesting project.

Donn

From: Susan Baumgartner [mailto:susan.l.baumgartner@gmail.com]
Sent: Tuesday, June 16, 2015 4:28 PM
To: Dennis,Donn M
Subject: Thank you!

Donn,

It was good to connect with you yesterday. I miss working with you. I appreciated your time and the opportunity to catch up with you. Good luck with your nephew and family! I hope all goes well. I will send the Chestnut Hill Ad Board email later today. I'm happy that we will be working together on that project if the license is granted (fingers crossed!). I wish you continued success and all the best.

Susan

Margaret Gedde, MD, PhD

Dr. Margaret Gedde is a Stanford-trained MD PhD pathologist and award-winning researcher who worked for years developing drugs in the pharmaceutical industry. In 2004, Dr. Gedde left that industry to open an alternative medical practice focused on holistic, supportive, non-pharmaceutical therapies that can offer large benefits to patients but are not accepted by conventional medicine. Currently, Dr. Gedde specializes in the use of cannabis to help patients get healthier and partake in a better quality of life.

Dr. Gedde has significant experiencing working with virtually all clinical services and therapeutic areas in hospital environments through consultations, nightly calls, examinations, and clinical rounds. As Chief Resident, she led morning resident rounds, organized didactic and journal club series, and was liaison to the administration, facilitating two-way communication between faculty and residents. She worked closely with patients, addressing resident complaints and practiced conflict resolution.

Working to benefit her patients, Dr. Gedde studied techniques by practitioners who used alternative methods including targeted nutritional therapy, therapeutic tissue cleansing, vibrational healing, herbal medicine, and bioidentical hormone therapy. Her clinics ultimately came to focus on the medical use of cannabis for her patients, offering individuals less risky therapy than any pharmaceutical in treatment of chronic pain, nausea and other conditions.

Jill Lamoureux

Jill Lamoureux is a nationally recognized cannabis business expert in Colorado with extensive experience in cultivation, manufacturing and distribution. Lamoureux was the only industry representative to serve on both the Colorado Department of Public Health and Environment and the Colorado Department of Revenue medical cannabis advisory committees. She also serves as a subject matter expert to BOTEC Analysis Corporation for Washington State. Lamoureux regularly consults to public and private clients on a wide variety of subject matter from operations and regulations to finance and due diligence.

Lamoureux has personally experienced the positive quality-of-life impact medical cannabis has on individuals and their families and has been an ardent patient advocate. Due to her first-hand experience with developing a newly regulated system in Colorado, Lamoureux understands the importance of addressing patient, industry, and regulator needs in an effective system.

Lamoureux has presented on cannabis operations, financing, and regulation in multiple venues including finance conferences, continuing legal education courses, law review panels, and most recently at RAND's public policy workshop. She earned her MBA from the University of Denver and has worked in small business start-ups and quasi-governmental entities. Lamoureux served as a municipal bond trustee, finance director, and treasurer for eight years before entering the medical cannabis industry. She served as the second Chair of the National Cannabis Industry Association. Lamoureux currently serves as the Chair of the Patient Focus Certification Review Board and as a member of the American Herbal Products Association Cannabis Committee. Lamoureux has presented on medical cannabis business topics and has taught CLE courses on rules and regulations nationally and in Canada.

As a former dispensary and cultivation owner and operator, she brings first-hand experience to her compliance work and procedures writing. Lamoureux has provided regulatory consulting for all three medical cannabis trade associations in Colorado and holds contracts with both legal and consulting groups providing compliance, application management, and writing services.

Jahan P. Marcu, Ph.D.

499 Maple St. #2
Brooklyn, NY 11225
215-828-9183
Rddirector@gsdiagnostics.com

EDUCATION:

Ph.D. Cell Biology, Temple University. "Novel Insights into CB1 Receptor Signaling and the Anabolic Role of Cannabinoid Receptors in Bone."
Bachelor of Science, Molecular Cell Biology, San Francisco State University, 2007.
Minor, Chemistry**,** San Francisco State University, 2007.
Minor, Speech and Communications**,** San Francisco State University, 2007

EXPERIENCE/ SCIENTIFIC TRAINING:

Director of Research and Development, Green Standard Diagnostics, CEO Beth McCauley, May 2013-Current

- **Current Focus:** Medical cannabis and herbal supplement regulation and consulting, auditing of medical cannabis operations for Patient Focused Certification program, method development and validation of quantitative analysis (Contamination, potency, and genetics) of medicinal plants, developing delivery systems for cannabinoids.

Graduate Student, Temple University School of Medicine, Department of Anatomy and Cell Biology, Center for Substance Abuse, Dr. Mary Abood. September 2008- May 2013.

- **Research Focus:** Presently involved in two research projects: 1) mutational analysis of the CB1 receptor and 2) investigating cannabinoid receptor signaling mechanisms in bone cells via CB1 and CB2 receptors.
- **Techniques Used:** PCR for generating plasmids with specific mutations, cell culture methods to create and maintain stable CB1 mutant cell lines, immunocytochemistry, radioligand binding assays, western blot analysis, isolation of stem cells from animals, and assays for determining the metabolic activity of bone.

Lab Manager & Technician, California Pacific Medical Center Research Institute, Dr. Dieter Gruenert May 2007-August 2008

- **Research Focus:** studying the cystic fibrosis transmembrane receptor and maintaining Dr. Dieter Gruenert's research program. This involved processing of material transfer agreements & reimbursement payments for cell lines, providing cell culture protocols & cell culture troubleshooting for laboratories, maintaining cell lines in culture for international shipping, maintaining an extensive cell line inventory, and routine characterization of the cell lines.

- **Techniques used:** Advanced and specialized cell culture techniques for human airway epithelial cells, basic culture techniques for stem and hematopoietic cells, qRT-PCR, and Mycoplasma detection.

Technician, California Pacific Medical Center Research Institute, Dr. Charles Cobbs
April 2008-August 2008

- **Research Focus:** Investigating the role of HCMV in neural stem cell oncogenesis, contributing critical information towards understanding the roles of this virus in glioma biology and a basis for the design of novel therapeutics targeting these tumors.
- **Techniques used:** Receiving and culturing primary brain tissue samples. Cell sorting for stem cell populations from primary brain tumors. DNA, RNA, and protein extraction from human brain tissue. Protein quantification and western blot analysis.

Technician, California Pacific Medical Center Research Institute. Mentor, Dr. Sean McAllister. July 2005-April 2008

- **Research Focus**: Investigating anticancer activity of synthetic and natural cannabinoids in brain cancer cell lines. Determining if synergistic inhibitory effects of cannabinoids, on cancer cells, are present using combinations of plant constituents.
- **Techniques Used**: Basic cell culture, MTT assay for analysis of cell proliferation, cell flow cytometry, Boyden Invasion Chamber Assay, and western blot.

Staff Research Associate II, Department of Diabetes and Endocrine Research**,** University of California San Francisco, Mt. Zion Campus. Principle Investigator Dr. Ira Goldfine. March 2005-August 2008.

- **Research Focus**: Maintaining a mouse colony. Investigating breast cancer pathology from the over expression of the human fetal insulin receptor in transgenic mice.
- **Techniques Used**: Plasmid Transformation, Polymerase Chain Reaction, DNA extraction, Harvesting organs from transgenic mice for whole mounts, paraffin embedding, and protein analysis.

Overseas Research Internship, University of Leiden, Holland. Principle Investigator**:** Dr. Arno Hazekamp. July 2006.

- **Research Focus:** Extraction, isolation, and molecular structure determination of plant compounds.
- **Techniques used:** Centrifugal Partition Chromatography, High-Performance Liquid Chromatography, Gas Chromatography-Mass Spectrometry, Thin Layer Chromatography, and Nuclear Magnetic Resonance

Independent Research Project, San Francisco State University. April 2003-December 2005. Supervisor: Dr. Pete Palmer

- **Research Focus**: Investigating a possible therapeutic applicability for ratios of active constituents on medicinal plants using Gas Chromatography-Mass Spectrometry and surveys.

Overview of Project:

- Conducted internet and library research on plant therapeutics
- Interviewed persons who regularly use plant-based medicine
- Developed experimental designs for compound specific quantification in plant extracts
- Attempted to correlate illness and symptomatic-specific applicability of compound ratios
- Knowledgeable in specific therapeutic values of different plants

PUBLICATIONS:

American Herbal Pharmacopeia, Monograph *Cannabis Inflorescence* Standards of Identity, Analysis, and Quality Control (2013) www.herbal-ahp.org.

Marcu, Jahan*, Christian, Rigel T.,*, Zielinski,Anne Horowitz Maxx P., Lau, Darryl, Moore, Dan H. Desprez, Pierre-Yves, Yount, Garret L., McAllister, Sean D. (2011) Cannabidiol enhances the inhibitory effects of delta9-tetrahydrocannabinol on human glioblastoma cell proliferation and survival. *J Mol Cancer Ther.*

Marcu, Jahan P., Shore, Derek, Kapur, Ankur, Trznadel, Megan, Makriyannis, Alexandros, Reggio, Patricia, and Abood, Mary E. (2013). Novel Insights Into CB1 Cannabinoid Receptor Signaling: A Key Interaction Identified Between EC3-Loop and TMH2. *J Pharmacol Exp Ther.*

Brailoiu, G. Cristina; Deliu, Elena; Marcu, Jahan; Abood, Mary; Brailoiu, Eugen. (2014) Differential Activation of Intracellular vs Plasmalemmal CB2 Cannabinoid Receptors. *British Journal of Pharmacology*

Shore DM, Baillie GL, Hurst DH, Navas F, Seltzman HH, Marcu JP, Abood ME, Ross RA, Reggio PH (2014). Allosteric Modulation of a Cannabinoid G Protein-coupled Receptor: BINDING SITE ELUCIDATION AND RELATIONSHIP TO G PROTEIN SIGNALING. *J Biol Chem*

Console-Bram, Linda*, Marcu, Jahan*, Abood, Mary (2012). Cannabinoid Receptors: nomenclature and Pharmacological Principles. *Prog Neuropsychopharmacol Biol psychiatry.*

Marcu, Jahan (2008-until Present) The Lab Bench (Quarterly popular science column published in West Coast Leaf Newspaper)

Marcu, Jahan (2005) An Interview with S.F.S.U. Professor Dr. Ramirez-Weber; The Discovery of a New Cellular Component in Drosphila. *IntersciMagazine* San Francisco State University's College of Science and Engineering magazine Vol. 8.#1.

*Both Authors contributed equally

PUBLICATIONS IN PROCESS:

Marcu, Jahan, Console-Bram, Linda, and Abood, Mary. Book Chapter: Current Cannabinoid Receptor Nomenclature and Pharmacological Principles in Endocannabinoid Regulation of Monoamines in Psychiatric and Neurological Disorders (Editor Van Bocksteale, E.)

AWARDS/GRANTS RECIEVED:

- Court Qualified Cannabis and Synthetic Cannabinoid Expert, Judge Renee Young, 2011
- 2005 Scholarship for Community Service from San Francisco State University
- 2005 and 2006 American's for Safe Access travel grants to attend research conferences in Europe and California.
- 2008 Temple University School of Medicine, Research Achievement Award
- 2009 Travel and research presentation award from the International Cannabinoid Research Society
- 2010 Travel award from the International Cannabinoid Research Society
- 2011 Travel award from the International Cannabinoid Research Society
- 2012 Travel award from the International Cannabinoid Research Society
- SFY10 *(*Abood, Mary) *The Anabolic Role of Cannabinoid Receptors in Bone.* 7/1/2010 – 6/30/2011. Commonwealth Universal Research Enhancement (CURE) Program. Under this Pennsylvania Department of Health established research program, research grants are awarded for clinical, health services, and biomedical research.
- 2013 American's for Safe Access Researcher of the Year Award

PROFESSIONAL AFFILIATIONS/ACADEMIC SERVICE:

Board of Directors, International Association for Cannabinoids as a Medicine, Member 2004-Present

International Cannabinoid Research Society. Member 2006-Present

President, Graduate Student Association, Temple University. August 2009-August 2011.

- Organized annual research days with guest speakers and poster presentations from graduate and medical students, and regular social events for graduate students. Other responsibilities included being an advisor to graduate school dean, giving presentations and fielding questions from prospective graduate students about Temple's graduate program, policies, and student life in Philadelphia.

Faculty, Master Class on Cannabis**,** University of Wageningen, Netherlands, Dr. Arno Hazekamp.Sept. 12th-17th, 2011

- Successful completion of the International Master's Course on Medical Cannabis involved meeting with the professionals behind the Dutch medicinal cannabis program, visiting a legal cannabis growing facility in Veendam, The Netherlands, visiting pharmacies that dispense medicinal cannabis, and learning to assess the cannabis at different stages of growth including forensic techniques for analyzing cannabis in a quality control laboratory.

- Additional Topics covered in his course include basic chemistry of cannabinoids and terpenes, quality control, clinical studies, and administration forms. By a combination of lectures, excursions, literature review and discussions, the course is a unique stepping stone to a more scientific understanding of cannabis as a medicine.

Senior Scientist, Co-Chair, Multidisciplinary and Scientific Advisory Board. Americans for Safe Access (ASA). Executive Director: Steph Sherer. 2005-present.

- Organizing and lecturing at a series of educational seminars on medical cannabis, cannabinoids, and endocannabinoids, contributing author on medical research materials, fundraising and volunteer work with HIV/AIDS and other terminally ill patients.

TEACHING AND TRAINING:

CME (Continuing Medical Education for Clinicians) Teaching Experience for the American Academy of Cannabinoid Medicine and the answerpage.com:
http://aacmsite.org/Default.aspx?tabid=104
www.theanswerpage.com

Student Mentoring: Megan Trznadel, B.A., Kirk Miller, B.S. (2010-2012)

- Undergraduate Students, Neuroscience Program, Temple University. Provided daily mentoring and supervision to these students, which resulted in submitting a co-authored publication and poster presentations at regional conferences.

Instructor/Co-Founder (2010-2011), Cannabinoid Discussion Group, Temple University

- A 1-credit course that is open to undergraduates, graduate, and medical students. Students and faculty take turns presenting published research articles or discussing recently generated data. Involved with organizing curriculum, recruiting students, inviting host/guest speakers, and giving background/introductory talks.

Morristown High School Science Academy Guest Speaker (2 times).

- Invited by the Program Director Jill Magdison to talk about cannabinoid research in a New Jersey high school. Also discussed the road to a science career, presented research, and answered questions about science careers from high school students

SCIENCE WRITING EXPERIENCE:

- Contributor to online CME material at theanswerpage.com, January 2014-Present,
- Research Associate, Editor at the American Herbal Pharmacopeia and Therapeutic Compendium. Cannabis Sativa Monograph, 2013. www.herbal-ahp.org. November 2011-Present.
- Online Editor, O'Shaughnessy's Journal of Cannabis in Clinical Practice, February 2012-Present,
- Editor/Writer, Sensible Science Blog, April 2010-Present.
- Medical Marijuana Writer/Journalist for Philadelphia Examiner, January 2010-Present.

Thomas McGinty

As the company's healthcare advisor, Thomas McGinty brings over twenty-five years of healthcare communications experience to the team. He will assist Chestnut Hill Tree Farm in creating educational programs for the Novia Derivative Products line. McGinty has three years of experience as an extractions and analysis chemist. Additionally, McGinty has three years of chemical analysis equipment service and sales experience. McGinty is an expert in pharmaceutical sales and industry networking, and will be a crucial asset to the company.

Mark J. Rice, MD

Mark Rice is an accomplished medical doctor who shall bring extensive experience in his field and fundamental guidance to the company's general operations and polices. Previously, Dr. Rice was a Professor of Anesthesiology and held the title of Chief of the Division of Multispecialty Adult Anesthesiology at Vanderbilt University, a prestigious private research university located in Tennessee. Currently he is an Associate Professor at the University of Florida College of Medicine's Liver and Transplant Anesthesiology Department. Dr. Rice's research interests include quality improvement, liver transplantation, noninvasive blood analysis, and reflective practice outcomes in medical education.

Dr. Rice is an inquisitive clinician with a passion for education as a power for change and improvement in the health care field. He completed his internship, residency, and research fellowship at the University of Wisconsin Hospital and Clinics Division. Over the past two decades, Dr. Rice has founded as directs several organizations including: Blue Ridge Medical, Inc., in Nashville, TN, Foviopticsc, Inc., in Lexington, Kentucky, as well as Foviopticsc, Inc., in Santa Clara, California where he also held Chief Medical Officer. Additionally, Dr. Rice served as Chairman in the Department of Anesthesiology at Johnson City Medical Center. In 2010, when the catastrophic earthquake hit Haiti, Dr. Rice responded to the international appeals for humanitarian aid, providing his medical services and care to a country in a time of crisis that desperately needed his efforts. While volunteering, Dr. Rice ran the operating room at Sacre Coere Hospital, Milot, Haiti, and performed anesthesia for earthquake victims. Upon his return to the U.S., he was awarded for the "University of Florida and Shands Haitian Relief Efforts," in Alachua Country, Florida.

Fwd: Advisory Board - Mark Rice

Tue, Jul 7, 2015 at 4:57 PM

Sent from my iPhone

Begin forwarded message:

From: "Rice, Mark John" <mark.j.rice@vanderbilt.edu>
Date: June 27, 2015 at 3:11:24 PM EDT
To: Bob Wallace <chnuts@gmail.com>
Subject: Advisory Board - Mark Rice

Per our discussion, this Email will confirm my willingness to serve on the Chestnut Hill Advisory Board to provide input on developing low THC content versions of cannabinoids for various medical applications, pending Chestnut Hill's securing a license from the State of Florida, my getting approval from the University in terms of the Conflict of Interest (COI) process, and final execution of a consulting agreement.

Mark J. Rice, MD
Professor
Division Chief, Multispecialty Adult Anesthesiology
Department of Anesthesiology
Vanderbilt University School of Medicine
615-343-9419 Office (Elizabeth Robison – Assistant)
615-936-6493 Fax
904.534.0289 Cellular

Mr. John L. Shermyen

Mr. John L. Shermyen serves as the Executive Chairman and Chief Executive Officer of Ingenios Health Co. He brings more than twenty years of executive leadership experience to Ingenios Health and is recognized as a visionary for his entrepreneurial style and bold approach to business.

Shermyen serves as a Venture Partner at Hickory Ridge Capital LLC. He has been the Chairman and Chief Executive Officer of L&L Acquisition Corp. since July 2010. He founded RadioSoft, Inc., in 1994, and served as its President and Chief Executive Officer from 1994 to July 2009. He is the Founder of Logisticare Solutions, LLC and has been its Chief Strategic Officer since May 20, 2009. Mr. Shermyen served as the Chief Executive Officer and President and of Logisticare, Inc. He served as the Chief Strategy Officer for Providence Service Corporation from May 20, 2009 to December 31, 2009. He founded LogistiCare Solutions, LLC in 1987. He served as President and Chief Executive Officer of Logisticare Solutions LLC, a subsidiary of Providence Service Corp. from December 2007 to May 20, 2009. Additionally, Shermyen founded Charter LCI Corporation in 1994. He served as Chief Executive Officer and President Charter LCI Corporation since its inception and Chairman from 1999 to 2004. Shermyen founded Automated Dispatch Services Inc. and served as its Chief Executive Officer from 1987 to 1993. He introduced the capitated, full-risk broker model to state governments, health insurers and other health-related entities in the early 1990’s.

As an executive with more than twenty years of management experience, Shermyen is recognized as a visionary for his entrepreneurial style and bold approach to business. He served as the Chairman of the Board and Director of LogistiCare Solutions, LLC. In 2003, he was recognized with the Ernst & Young Entrepreneur of the Year Award ® in the Business and Technology Services Category for the Southeast region. Mr. Shermyen received his Bachelor's Degree in Geography and Computer Cartography in 1976 and Master's degree in Geography and Computer Cartography in 1979 from the University of Florida.

Fwd: Letter for Advisory Panel

Tue, Jul 7, 2015 at 4:56 PM

Sent from my iPhone

Begin forwarded message:

From: Robert Wallace <chnuts@gmail.com>
Date: July 3, 2015 at 8:12:25 AM EDT
To: john shermyen <jshermyen@gmail.com>
Subject: Re: Letter for Advisory Panel

Per our discussion, this Email will confirm my willingness to serve on the Chestnut Hill Advisory Board to provide input on developing the medical business for low THC content cannabinoids for various medical applications, pending Chestnut Hill's securing a license from the State of Florida, and final execution of a consulting agreement.

Bob

R.D. Wallace
Chestnut Hill
15105 NW 94 Ave
Alachua, FL 32615
352-219-5825

On Fri, Jul 3, 2015 at 7:33 AM, <jshermyen@gmail.com> wrote:

> Sure. Just send me a few details so I get right entity names etc.
>
> Sent from my iPhone
>
> On Jul 3, 2015, at 6:54 AM, Robert Wallace <chnuts@gmail.com> wrote:
>
>> Could you write a couple of sentence email that says that you agree to be on the Adv Panel if we get a license?
>>
>> Thanks - in full blown application mode. Call if you have time.
>>
>> Bob
>>
>> R.D. Wallace
>> Chestnut Hill
>> 15105 NW 94 Ave
>> Alachua, FL 32615
>> 352-219-5825

Josh Stanley

Josh Stanley is a leading medical cannabis entrepreneur and advocate working to advance the medical cannabis industry in the U.S. and throughout the world. Stanley brings to the company over eight years of experience working in the cannabis industry and additionally was one of the first individuals to open a medical cannabis dispensary in Denver, Colorado.

Stanley has been heavily involved in responsible cannabis reform and began Colorado's political action committee and 501c4, the Medical Marijuana Industry Group, which he co-chaired. In 2010, Stanley assisted in the drafting of House Bill 1284, the first bill of its kind to further define and establish Colorado's medical cannabis state regulatory structure through the Colorado Department of Revenue. The following year he co-authored House Bill 1043 and was responsible for writing the research and development portion of the bill. Additionally, Stanley has developed rules and regulations for the Colorado Department of Revenue's Medical Marijuana Enforcement Division as well as the rules and sat on the rules and regulations board for research and development.

Stanley has been co-credited with creating a non-psychoactive strain of the cannabis plant with low-THC and high-CBD content. This specialized breed of sativa variety of medical cannabis has proven to be highly beneficial for varying degrees of epilepsy in both pediatric and adult patients. Stanley's effort to help children patients restore their lives with high-CBD cannabis extracts made international headlines in 2013 and was prominently featured on Sanjay Gupta's highly acclaimed CNN documentary in March of 2014. In addition, Stanley worked with the National Geographic Channel, who tracked his observational research studies and patient successes with medicinal cannabis in Colorado.

In April 2012, Stanley and his five brothers co-founded the "Realm of Caring," a nonprofit organization, committed to promoting a higher-quality of life for Coloradans affected by debilitating conditions through the use of non-smokable forms of concentrated CBD cannabis oil. In 2014, Josh founded "Strains of Hope," a nonprofit dedicated to assisting principalities across the globe in the implementation of responsible rules and regulations of the cannabis industry and to provide further medical research of the cannabis plant as it pertains to a variety of illnesses and disease states.

LETTER OF INTENT - MUTUAL LICENSING AGREEMENT

THIS AGREEMENT made this 15th day of June 2015 by and between **Chestnut Hill Tree Farm ("Chestnut Hill")** 15105 NW 94 Ave., Alachua, FL 32615; and **Citiva Medical LLC ("Citiva")** 7378 Amboy Road, Staten Island, NY 10307, (collectively, "the Parties").

WHEREAS the Parties are interested in securing a mutual, reciprocal, licensing agreement for the purpose of production and distribution of medical cannabis products; and,

WHEREAS the Parties acknowledge and agree that medical cannabis products should be developed, marketed and distributed according to mutually agreeable medical standards and protocols; and,

WHEREAS, the parties agree and acknowledge that this Agreement and the contemplated Mutual Licensing Agreement is contingent upon Chestnut Hill receiving approval by the State of Florida to act as a dispensing organization for medical use of low-THC cannabis in Florida.

NOW THEREFORE, the Parties agree as follows:

1. Citiva contemplates providing genetic plant material, including strains of Low-THC cannabis, for growing and production by Chestnut Hill for Florida's market pursuant to mutually agreeable medical protocols.
2. Citiva contemplates providing its proprietary illness-targeted medical products for Chestnut Hill to produce and market under a license agreement in Florida.
3. This License Agreement shall clarify roles and responsibilities regarding business terms, scope, duration, geography, remuneration, payment terms, etc. which will be negotiated in good faith.
4. Chestnut Hill contemplates providing its proprietary medical delivery products and systems to Citiva for their use in their medical products.
5. Chestnut Hill agrees to facilitate research in breeding, development and clinical trials for Citiva's products at the University of Florida and various research institutions in Florida.

IN WITNESS WHEREOF, the Parties hereto have caused this Agreement to be executed by their duly authorized officers as of the date first written above.

Frank Turano

Frank Turano - CFO
Citiva Medical, LLC

RD Wallace

R.D. Wallace
Chestnut Hill Tree Farm

Shannon Wilson

Shannon Wilson is the founder and owner of Colorado-based Mahatma Concentrates. The company's core belief is simple, to produce only the best, high quality cannabis extractions. This philosophy has resulted in Mahatma Concentrates being recognized through numerous awards including:

- First place in best concentrates in the 2013 High Times Cannabis Cup;
- Second place in best cannabis concentrates in the 2013 710 Cup;
- First place in the best overall champion at the Daba-Doo Invitational in Amsterdam in 2013 and;
- Second place in best concentrates at the Hemp Connoisseur Championship in 2014.

Wilson is an active member of the NCIA, CBA, and MIG. In addition, she is a founding member of Women Grow and currently serves as chairman for MIG's Concentrates Committee. Wilson offers valuable insight and expertise to the company, scaling a large manufacturing operation within a regulated environment successfully.

PROFESSIONAL LICENSING DISCLOSURE

Employee/Consultant Statement – Professional Licensure Disciplinary Action
Attn: Office of Compassionate Use – Florida Department of Health

---

Instructions – please initial the correct statement.

SLB I hereby attest that I have never received a professional licensure disciplinary action in any jurisdiction.

_____ I have received one or more professional licensure disciplinary actions. If initialed, please provide an explanation:

Susan L. Baumgartner
Signature

Susan L. Baumgartner
Printed Name

7/2/15
Date

Employee/Consultant Statement – Professional Licensure Disciplinary Action
Attn: Office of Compassionate Use – Florida Department of Health

Instructions – please initial the correct statement.

BB X I hereby attest that I have never received a professional licensure disciplinary action in any jurisdiction.

_____ I have received one or more professional licensure disciplinary actions. If initialed, please provide an explanation:

Signature

Brady Blake
Printed Name

7/6/15
Date

Employee/Consultant Statement – Professional Licensure Disciplinary Action
Attn: Office of Compassionate Use – Florida Department of Health

Instructions – please initial the correct statement.

DAG I hereby attest that I have never received a professional licensure disciplinary action in any jurisdiction.

_____ I have received one or more professional licensure disciplinary actions. If initialed, please provide an explanation:

Deborah A. Gaw
Signature

Deborah A. Gaw
Printed Name

7/2/15
Date

Employee/Consultant Statement – Professional Licensure Disciplinary Action
Attn: Office of Compassionate Use – Florida Department of Health

Instructions – please initial the correct statement.

_____✔ I hereby attest that I have never received a professional licensure disciplinary action in any jurisdiction.

_____ I have received one or more professional licensure disciplinary actions. If initialed, please provide an explanation:

_____
Signature

Sam Glucksman, DPM, CCA
Printed Name

7-02-15
Date

Employee/Consultant Statement – Professional Licensure Disciplinary Action
Attn: Office of Compassionate Use – Florida Department of Health

Instructions – please initial the correct statement.

KMP I hereby attest that I have never received a professional licensure disciplinary action in any jurisdiction.

_____ I have received one or more professional licensure disciplinary actions. If initialed, please provide an explanation:

Signature

Kristopher Palmer
Printed Name

7-2-15
Date

Employee/Consultant Statement – Professional Licensure Disciplinary Action
Attn: Office of Compassionate Use – Florida Department of Health

Instructions – please initial the correct statement.

✓ I hereby attest that I have never received a professional licensure disciplinary action in any jurisdiction.

_____ I have received one or more professional licensure disciplinary actions. If initialed, please provide an explanation:

Signature

ROBERT D. WALLACE
Printed Name

7/1/15
Date

EMPLOYEE TRAINING REQUIREMENTS

The company's staff will be assisted by the company's expert advisors during start-up operations. The employee acquisition process is detailed along with procedures for skill-set assessments, terminations, and transitions. The company's policies dictate that no employee or consultant may work on-site prior to receiving a Level 2 background check and orientation training, or when any required critical training is eight weeks or more past due after employment.

All cultivation employees will receive employee manuals prior to employment. The employee manual provides in-depth training for cultivation policies and procedures. The Cultivation Director is responsible for ensuring that each employee has received, read, and acknowledged their understanding of the material covered in the employee manual. All cultivation facility employees will be trained by the Cultivation Director and will be required to continually demonstrate a working knowledge of training materials as a condition of employment. All employees are required to have a working knowledge of crop production standards established by the Cultivation Director for medical cannabis production.

Any changes to the cultivation SOPs will be communicated to all cultivation facility employees and an acknowledgement of understanding will be documented for each employee. The company is dedicated to training all employees to excel in their position. It is policy to ensure that all employees receive professional and appropriate training on compliance with state law, the therapeutic use of medical cannabis, safety, security, incident management, and diversion and theft prevention. No employee may work on-site prior to receiving orientation training or when any required critical training is past due. All cultivation employees will receive training on the cultivation methods and products employed by the company. The Cultivation Director will ensure that prior to beginning work in the cultivation facility, employees receive full training on:

- The methods of cultivation used by the cultivation facility;
- The methods of fertilization used by the cultivation facility;
- Methods for recognizing the signs of insect infestation, pathogens and disease in cannabis plants and the procedures for eradication and the safe disposal of plants so affected;
- The nutritional requirements of cannabis plants at various growth stages, including, without limitation, proper mixing and dispersal of fertilizer, flushing procedures and procedures for postharvest trimming, drying and curing; and
- The safe handling of equipment, including, without limitation, high-intensity discharge lamps, electrical ballasts, pumps, fans, cutting implements and other equipment for cultivation.

The Cultivation Director with oversight by the Chief Operating Officer will approve third-party training and certifications for cultivation staff. Training and audit programs authorized for use by management at this time include:

- Good Agricultural Practices ("GAPs"): Developing a Food Safety Program for Vegetable and Fruit Growers/Packers – University of Florida, IFAS Extension Program.
- Food Safety First! Is an approved food worker training program, meeting all requirements of Chapter 509 of the Florida Administrative Code. 360training.com and Learn2Serve have partnered with Environ Health Associates, Inc., the sole owner of the course and the approved vendor for the program.
- International Food Protection Training Institute: FDA Pest Control in Food Establishments, Plumbing Controls for Commercial Food Establishments, and HACCP trainings.

AMERICANS FOR SAFE ACCESS

Chestnut Hill Tree Farm, LLC has entered into a letter of intent with Americans for Safe Access to provide annual certification and on-site training services. Our advisor, Jill Lamoureux, designed the certification program to evaluate

a cannabis business operation's compliance with the American Herbal Products Association health and safety recommendations to regulators for best practice. Jahan Marcu, PhD also serves as an auditor for the program. Both advisors will recuse themselves from the audit process. The onsite training will occur once per year and be mandatory for all employees and management. The training curriculum currently encompasses the following PFC Required Trainings:

A. CORE CANNABIS CERTIFICATION (CCC): The CCC training provides the foundation for PFC required trainings and is a prerequisite for additional training. All PFC auditor trainees are required to successfully complete the CCC. The CCC courses address the following topics.
    1. CANNABIS RESEARCH AND CLINICAL DATA: Find out what research is revealing about the therapeutic potential of cannabis, and learn what types of pain, disorders and diseases this plant potentially relieves. Clinical trials and their importance are also covered. Finally, see what groundwork has been laid for future cannabis research.
    2. THE ENDOCANNABINOID SYSTEM: This module gives a brief history of opioids and cannabinoids, and explains how the endocannabinoid system was discovered. The workings of the endocannabinoid system as well as the physiological role of endocannabinoids are also discussed.
    3. CANNABIS 101: Gain a fundamental understanding of the cannabis plant by learning the varieties of cannabis and their uses, the most common cannabinoids, the effects of cannabis, and the difference between psychoactive and non-psychoactive cannabinoids.
    4. CANNABIS-BASED MEDICINES: Cannabis-Based Medicines covers the cannabis pharmaceuticals that are currently available. It also takes a look at cannabis extracts and concentrates and how they might be used. The module concludes with a section on cannabis edibles and a brief discussion about how cannabis might be incorporated into food and drink.
    5. QUALITY OF CARE: Targeted at dispensary workers, this module covers customer service, how to identify and handle medical emergencies, and patient education. A discussion of the Patient's Bill of Rights finishes the module.
    6. KNOW YOUR RIGHTS: This module prepares you for interactions with federal law enforcement (FLE). Know what to do in event of detainment or arrest as well as how to answer questions from FLE. Finally, understand when Miranda warnings apply.
    7. RAID PREPAREDNESS: Cannabis businesses are at risk for being raided. Know what to do should this happen. In this module, learn what operations should be followed during a raid. Discover what legal and logistical preparations should be taken as well as how to activate supporters. Knowing how to handle those inside and out- side of the raided facility is also an important consideration. Finally, learn what steps should be taken after a raid is over.
    8. RUNNING A SAFE BUSINESS: Dispensaries, growers, and processing centers alike need to take precautions to ensure the safety of their product. Learn how to spot contaminants and maintain safe and sanitary conditions. Security considerations will also be discussed. The module concludes with tips on neighborhood and community relations.

B. NATIONAL STANDARDS COURSES: The National Cannabis Standards Training(s) are designed to educate attendees about the particulars of compliance with the discipline specific AHPA and AHP guidelines and are available in four cannabis industry disciplines. PFC auditors are required to successfully complete the National Standards Course work in the discipline(s) that the auditor will be working in. For example, all auditors who will be auditing cultivation and/or processing facilities must successfully complete the National Standards Course in Cultivation and Processing.
    1. CULTIVATION AND PROCESSING: Based on the AHPA Recommendations to Regulators for Cultivation and Processing operations, this training applies to all types of

cultivation operations: outdoor, greenhouse, and indoor cultivation facilities. This training is designed to provide learners with the skills necessary to implement Good Cultivation Practices including pesticide guidance, facility requirements, water resource management, recordkeeping, product safety recall systems, adverse event recording, and information disclosure. This course also explores best practices and safe handling procedures for operations that provide post-harvest processing of cannabis.

2. MANUFACTURING, PACKAGING, LABELING AND HOLDING: Designed for individuals engaged in the manufacturing of cannabis and cannabis-derived products, this training is designed to provide learners with the tools necessary to comply with General Management Practices including general personnel responsibility and safety, physical condition of the plant and surrounding grounds, manufacturing controls, packaging, holding and labeling controls, cannabis material acquisition, inventory and recordkeeping, fielding and documenting complaints and product returns, product safety recalls, and adverse event recording.
3. LABORATORY ANALYSIS: Designed for individuals performing laboratory analysis of cannabis, cannabis-derived products, and hemp products, this course has been developed to educate learners on good laboratory practices and focuses on facility security, sample handling and disposal, data management, personnel safety and hygiene, and reporting activities that may be unique to laboratories analyzing cannabis, cannabis- derived products, and hemp samples.
4. DISTRIBUTION: This comprehensive training is designed to provide participants with the skills necessary to implement Best Management Practices relating to the distribution of cannabis and cannabis-derived products directly to compliant individuals through storefront operations, delivery services, direct-from-garden operations, and growing co-op operations. This training includes information regarding personnel policies, facility security, product acquisition, record keeping, customer policies, implementable product safety recall systems, and adverse event recording.

C. PESTICIDE GUIDANCE AND INTEGRATED PEST MANAGEMENT (IPM): This in-person course is required for all auditors who will be inspecting cultivation and processing facilities. During this course, auditors are familiarized with key definitions pertaining to pesticides and learn how to properly read a pesticide label. The course will also explore the importance and function of tolerance thresholds, major chemical families, Restricted Entry Intervals (REI's), and Personal Protective Equipment (PPE's) as well as employee safety and employer responsibilities. The second portion of this course covers the key components to successful IPM.

D. SUSTAINABILITY, SANITATION, AND RECORD KEEPING FOR CULTIVATION FACILITIES: This course is required for all PFC auditors engaged in cultivation and processing inspections. Designed to help cultivators reduce their impact on the environment, this course provides tools for reducing the carbon footprint of cultivation operations as well as the use, recycling and reuse of mediums. In addition, this course discusses appropriate nutrient use, the consequence of mined and imported materials, and the proper storage of chemicals. Water sources, use, storage and reduction techniques are also addressed in this course as is the proper tracking of materials used during the cultivation process.

E. REPRESENTATIVE BATCH and LOT SAMPLING - QA/QC: This course is required of all PFC auditors regardless of the discipline(s) they will be auditing. During this in-person course, learners will be provided with an overview of paradigm shifts and global perspective relating to QA/QC. Details on developing and implementing Quality Assurance (QA) and Quality Control (QC) systems will be discussed including method validation and General Manufacturing Practices (GMP's) as they relate to QA/QC topics.

REQUIRED TRAINING SCHEDULE

TRAINING MATRIX				Chief Operating Officer	Controller/Bookeeper	Inventory Manager	Admin Assistants (All Units)	Medical Director	Dispensary Manager/Asst Mgr	Patient Associate	Dispensary Asst.	Cultivation Manager/Asst Mgr	Processing Manager	Cultivation Technician	Harvest Technician	Manufacturing Manager/Asst Mgr	Extraction Manager/Technician	Production Manager/Technician	Packaging Manager/Technician	Operations Manager	Quality Control Unit	Security Manager/Officer	Facilities Manager	Transportation Manager
Training Module	**Hrs.**	**No.**	**Trainer**	**ADMIN**				**DISPENSARY**				**CULTIVATION**				**PRODUCTION**				**OPERATIONS**				
Train the Trainer	16.0	1/yr	3rd Party	x		x		x	x			x				x					x			
*New Employee Orientation	8.0	1x	Unit Mgr		x	x	x	x	x	x	x	x	x	x	x	x	x	x	x	x	x	x	x	x
Medical Cannabis Science	4.0	1/yr	3rd Party					x	x	x	x	x		x		x	x	x			x			x
*Production Safety	2.0	2/yr	Production Mgr					x									x	x	x	x				
Patient Relations	2.0	2/yr	Dispensary Mgr				x	x		x	x										x			x
Monthly Unit Meetings	2.0	12/yr	Unit Mgr		x	x	x	x		x	x		x	x		x	x	x	x	x		x	x	x
Medical Cannabis Science Update	2.0	1/yr	3rd Party					x	x	x	x	x				x	x	x			x			x
Compliance, Regulation, and Law	2.0	1/yr	COO		x	x	x	x	x	x	x	x	x	x	x	x	x	x	x	x	x	x	x	x
Transportation	1.5	1/yr	COO			x		x	x	x	x	x								x		x		x
*Cultivation Safety	1.0	2/yr	Cultivation Mgr									x	x	x	x				x	x				
*Cultivation Security	1.0	2/yr	Cultivation Mgr			x						x	x	x	x				x	x		x		
*Dispensary Security	1.0	2/yr	Dispensary Mgr			x		x	x	x	x									x		x		
*Confidentiality	1.0	1/yr	HR	x	x	x	x	x	x	x	x	x	x	x	x	x	x	x	x	x	x	x	x	x
Emergency/Incident Management	1.0	1/yr	COO			x	x	x	x	x	x	x	x	x	x	x	x	x	x	x	x	x	x	x
Inventory Control and Diversion Prevention	1.0	1/yr	Inventory Mgr		x		x	x	x	x	x	x	x	x	x	x	x	x	x	x	x	x		x
Recordkeeping	1.0	1/yr	GM		x	x	x	x	x	x	x	x	x			x	x	x	x	x	x	x		x
Product Handling and Sanitation	1.0	1/yr	GM			x		x	x	x	x	x	x	x	x	x	x	x	x		x			x
*Dispensary Safety	0.5	2/yr	Dispensary Mgr					x	x	x	x									x				

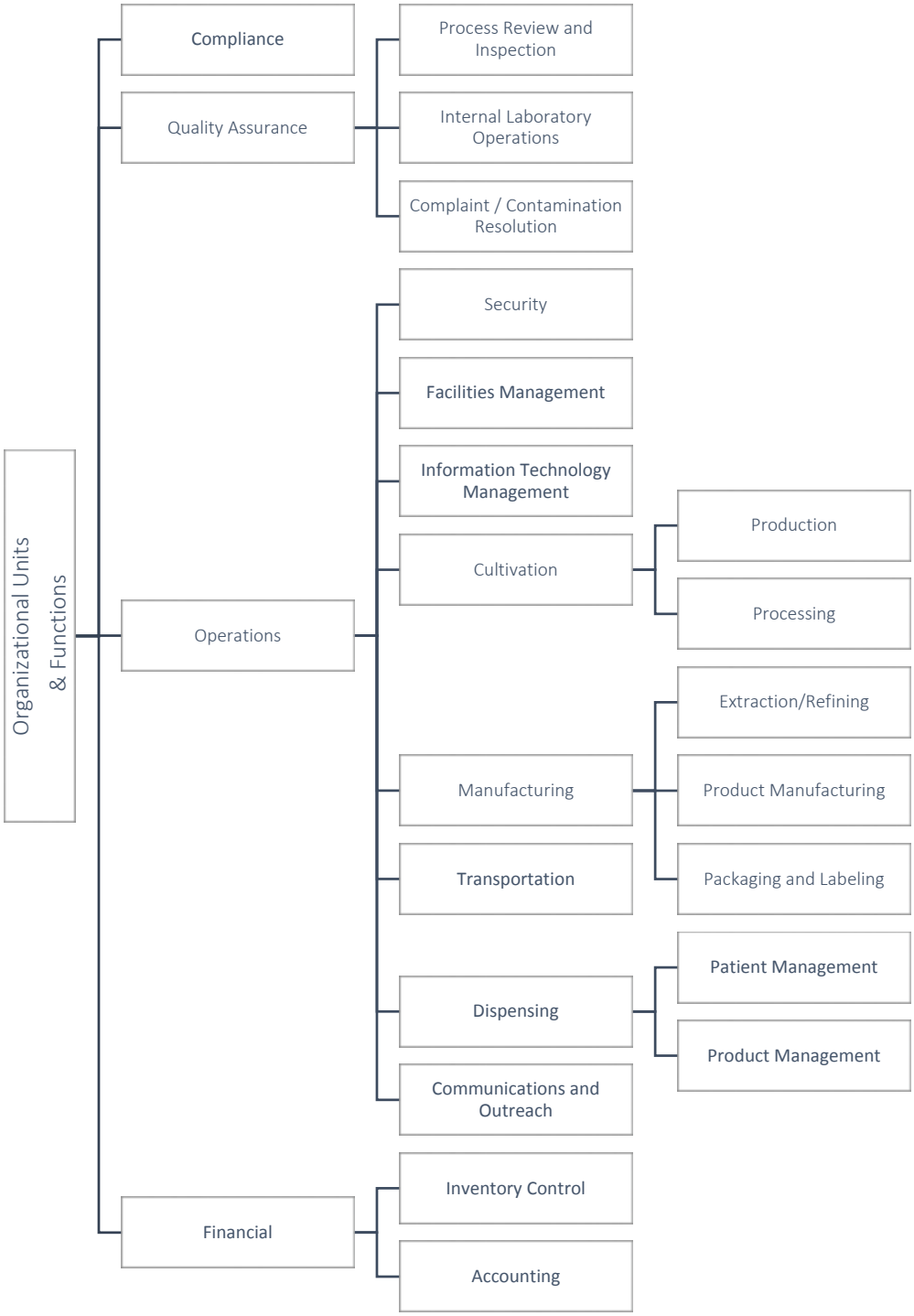
*Required prior to working on site.

Part 3.A.3.j. A list of current and proposed staffing for cultivation

Part 3.A.3.k. An organizational chart illustrating the supervisory structure of the cultivation function of the proposed Dispensing Organization

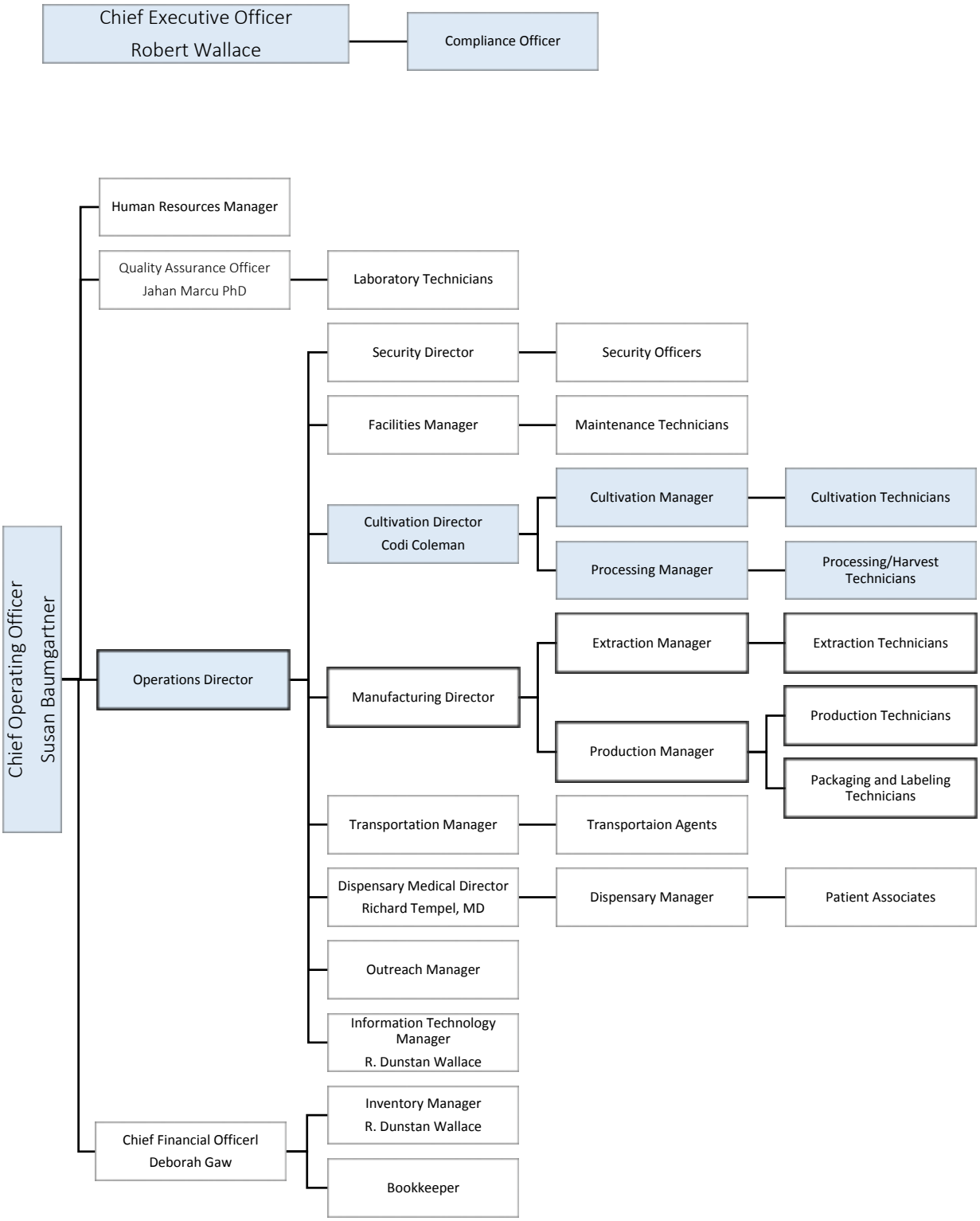
FUNCTIONAL OVERVIEW

The company is structured by operating functions. The chart below illustrates the units of division.



Part 3.A.3.k. An organizational chart illustrating the supervisory structure of the cultivation function of the proposed Dispensing Organization

PROCESSING UNIT



Part 3.A.3.k. An organizational chart illustrating the supervisory structure of the cultivation function of the proposed Dispensing Organization

REDUNDANCY FOR KEY PERSONNEL

The company's staffing plan contemplates cross training for all key personnel. This integrated organizational structure allows the maintenance of the company's high operating standards even when key personnel are absent. Each operating unit will always ensure that a minimum of two staff members are capable of managing the highest functions of the unit.

RETENTION OF EXPERTS

Multiple industry experts have already been retained by the company as advisors for the planning and application process. These experts will remain engaged with the company during start-up operations. They provide professional back-up options for all cultivation functions in the organization. These advisors have allocated time to assisting the company and will be available in any emergency scenario to provide operational functionality until normal operations are restored. As these experts designed the company's operating model, they are the best solution during stressed operating periods.

CONTINGENCY PLANNING

The loss of one key employee can cripple the operation. The Chief Executive Officer and Chief Operating Officer will develop contingency plans for human resource risks such as death, disability, family leave, or turnover. The plan will help to reduce the company's risk of operational failure.

PLAN ELEMENTS

The company's human resource contingency plan addresses several components. The plan seeks to make it easier to replace departing personnel and to reduce the chance of their leaving. The Chief Operating Officer will provide an annual risk-assessment that:

- Determines potential human resource risks;
- Ranks the probability any given risk will occur; and
- Estimates the severity of the impact on the company.

The annual business impact analysis evaluates how losing a given employee will affect operations and the company's finances. The plan will identify risk mitigation strategies for the identified risks.

RISK MANAGEMENT

Chestnut Hill Tree Farm will manage human resource risks by retaining, reducing, avoiding, or transferring them. Human resource policies reduce the probability of a key personnel from electing to resign. Strict protocols addressing employee benefits and personnel policies provide key employees with an understanding of their roles and responsibilities reducing job dissatisfaction.

TRANSFERRING RISK

Key person insurance transfers some key personnel risk. The policy protects against the death or disability of key employees. The company will use the proceeds from these policies to keep the company running until a replacement is identified and trained. The company will carry key employee insurance for the head of each operating unit. The policy will allow the company to immediately bring in consultants and industry experts to help manage and recruit and train a replacement so that no operational interruptions occur.

STAFF ACQUISITION PROCESS

The Human Resources Manager will coordinate with the Chief Operating Officer to acquire all necessary staff including key personnel. The acquisition process may vary depending on the vacant position and any special circumstances including Chief Executive Officer approval for a direct non-solicited hire. The acquisition process is managed by the Human Resources Manager and typically involves the following:

- Identification of need.
- Job classification and job description preparation.
- Solicitation of the vacant position utilizing the methods that best fit the position including, but not limited to:
  1. Internal posting,
  2. Partner posting (consultants, non-profit partners, vendors, etc.),
  3. External posting,
  4. Temporary staffing agency; or
  5. Executive search firm.
- Reviewing resumes and required job applications for qualified candidates including those with relevant experience and those with complementary skills and a strong potential for growth.
- Performing and recording reference checks on qualified candidates including verification of address, education, and former and current employment.
- Recording of information from former supervisors on the candidate's performance if available.
- Scheduling first interviews.
- Scheduling second interviews (with strong candidates) with the direct supervisor.
- Delivery of an offer letter to the first choice candidate (as determined by the direct supervisor).
- Performing a Level 2 criminal background check on the selected candidate to determine eligibility and to identify any other possible disqualifying items.
- New hire orientation and training.
- Completion of the probationary period.

CONSULTANT ACQUISITION

Consultants may be utilized when approved by the Chief Executive Officer. All consulting contracts must contain suitability provisions and require compliance with all applicable laws and regulations. Consultants must receive and acknowledge the company's Employee Handbook and Standard Operating Procedures and bear the same responsibilities as employees of the company. Consultants may be used where third-party services are desired for separation of duties (i.e. IT, accounting, and audit and compliance).

DISQUALIFYING ITEMS AND ITEMS OF CONSIDERATION

Chestnut Hill Tree Farm will not hire any person that is not eligible. All staff must be 21 years of age or older. The Human Resources Manager will not employ anyone who will come in contact with or handle medical cannabis who has been convicted of any theft, violent crime, or felony of sale or possession of drugs, narcotics, or controlled substances. Other items discovered through the reference check process may be considered when making a hiring decision including, but not limited to:

- A history of theft, acts of violence, or negligence;
- Unverifiable resume or application statements;
- Negative reference checks or inability to obtain a positive reference from any former employers;
- Lack of stability in work history or residence;

- Employment with any independent laboratory providing services for the operation or physician's office providing medical cannabis patient certifications.

DISCRIMINATORY PRACTICES

Chestnut Hill Tree Farm does not discriminate in hiring or operating decisions. All managers and supervisors must comply with all EEOC guidelines when managing staffing issues. No policy or procedure implemented by the company may lead to discrimination based on or conflict with laws regarding:

- Race
- Height or Weight
- Credit Rating or Economic Status
- Religious Affiliation or Beliefs
- Citizenship
- Marital Status, Number of Children
- Gender
- Arrest or Conviction unless in a sensitive position
- Security/Background Checks For Certain Religious or Ethnic Groups
- Disability
- Medical Questions & Examinations

WORKER SAFETY AND PROTECTION

The company's safety policies detail procedures for ensuring the implementation of best safety practices at all times and in accordance with Occupational Safety and Health Administration ("OSHA") guidelines throughout all facilities and operations. The systematic guidelines established will be strictly enforced, as the safety of employees and the public is the company's foremost business consideration. All employees must comply with all applicable safety regulations as listed in the Standard Operating Procedures ("SOPs") as a condition of employment. Safety training will be provided as often as necessary and annually at a minimum.

Employer and employee responsibilities are addressed in the SOPs and a designated Safety Coordinator is named as the primary contact for safety-related matters. Regular required safety inspections are required along with respirator use and training procedures.

All facilities will be inspected quarterly by the Facilities Manager to identify potential hazards using the OSHA Self-Inspection Checklist to prevent hazardous material and chemical incidents that could result in injury and/or illness to any employee or visitor. It is established that requirements of OSHA's Hazard Communication standard will be met and unit managers are assigned responsibility for conducting job specific hazard training on chemicals used by their employees. After attending training, each employee will sign a form to verify that he or she attended the training and understands the company's policies on hazard communication.

Copies of Material Safety Data Sheets ("MSDS") for all hazardous chemicals to which employees may be exposed will be available on the intranet and by hard copy in each chemical storage area of the operating unit in a designated MSDS binder. Sample documents include accident report forms, a safety rule violation notice, and the OSHA Self-Inspection Checklist.

Safety rules addressed include those relevant to accident and hazard reporting, drug and alcohol use, driving, work-related injuries and the required use of Personal Protective Equipment ("PPE"). Enforcement measures and disciplinary actions detailed are to be implemented in response to safety rule violations established herein. All emergency situations including chemical spill response will be handled by local emergency response agencies in accordance with the company's emergency and incident response SOPs. Additional measures serve to establish procedures for injury claims and policies related to workers' compensation and benefits provided.

RESOURCES

Occupational Safety and Health Administration
Florida Department of Agriculture and Consumer Services – Agricultural Worker Safety

CULTURE OF SAFETY

It is the policy of the company that the safety of its employees and the public is the company's foremost business consideration. The prevention of accidents and injuries takes precedence over expedience. In the conduct of the company's business, every attempt will be made to prevent accidents from occurring. The company requires that its employees, as a condition of employment, comply with all applicable safety policies and procedures.

The designated Safety Coordinator is the primary contact for safety-related matters. All employees will receive an orientation of the safety policy and rules upon initial employment, and are required to bring to the attention of their unit manager or the Safety Coordinator any unsafe or non-compliant conditions or practices. Managers must

communicate these concerns to the Safety Coordinator, who will respond to reports within twenty-four hours. Safety training will be provide as often as necessary and annually at a minimum.

Senior management will be actively involved with employees in establishing and maintaining an effective safety program. The Chief Operating Officer, Safety Coordinator and other members of the management team will participate with all dispensary employees in an ongoing safety program.

COMPANY RESPONSIBILITIES

The Chief Operating Officer in coordination with unit managers must:

- Provide a safe workplace.
- Facilitate monthly safety meetings.
- Provide safety and health education and training.
- Annually review and update workplace safety rules.

EMPLOYEE RESPONSIBILITIES

All employees must:

- Report all unsafe conditions.
- Immediately report all work-related injuries.
- Wear the required personal protective equipment.
- Abide by the organization's safety rules at all times.

SAFETY COORDINATOR RESPONSIBLITIES

It is the policy of the company to assign a Safety Coordinator to oversee all safety related matters and chair the company's safety committee. The Chief Operating Officer must designate a Safety Coordinator for the company who will be the primary contact for safety-related matters.

Employee Reporting

All employees will receive an orientation to this company's safety rules upon initial employment and must bring to the attention of to their unit manager any unsafe conditions or practices. Unit managers will communicate these concerns to the Safety Coordinator, who will respond to these concerns within twenty-four hours.

Responsibilities of the Safety Coordinator

The Safety Coordinator is responsible for overseeing implementation of the organization's safety program. The Safety Coordinator will:

- Maintain compliance with state mandated rules including current poster provisions and forms available to employees.
- Annually review organization safety policy and rules.
- Maintain accurate records and annually report the results of workplace accident and injury trend analysis.
- Recommend actions to reduce the frequency and severity of accidents and illnesses.
- Integrate safety into the day-to-day activities of all employees.
- Coordinate the new employee orientation and safety training programs.
- Assist the organization in compliance with government standards concerning safety and health.
- Assist unit managers with accident investigation.
- Conduct and record periodic safety inspections to identify unsafe conditions and practices and to determine remedies.

- Ensure all employees are properly trained on hazardous conditions in their unit and that all termination points for gas, electric and water service are clearly marked and known to employees.
- Make recommendations to the Chief Operating Officer on matters pertaining to safety.

Inspections Required

The Safety Coordinator or his or her designee must inspect all the company facilities quarterly to identify potential hazards using the OSHA Self-Inspection Checklist attached. A responsible party must be assigned to correct all hazards as soon as possible. If the hazard is extreme, the inspector in his or her discretion may contact the unit manager to terminate operations until corrected. Per OSHA recommendations, inspections must cover:

- Processing, Receiving, Shipping and Storage - equipment, job planning, layout, heights, floor loads, projection of materials, material handling and storage methods, training for material handling equipment.
- Building and Grounds Conditions - floors, walls, ceilings, exits, stairs, walkways, ramps, platforms, driveways, aisles. Housekeeping Program - waste disposal, tools, objects, materials, leakage and spillage, cleaning methods, schedules, work areas, remote areas, storage areas.
- Electricity - equipment, switches, breakers, fuses, switch-boxes, junctions, special fixtures, circuits, insulation, extensions, tools, motors, grounding, national electric code compliance. Lighting - type, intensity, controls, conditions, diffusion, location, glare and shadow control.
- Heating and Ventilation - type, effectiveness, temperature, humidity, controls, natural and artificial ventilation and exhausting.
- Machinery - points of operation, flywheels, gears, shafts, pulleys, key ways, belts, couplings, sprockets, chains, frames, controls, lighting for tools and equipment, brakes, exhausting, feeding, oiling, adjusting, maintenance, lockout/tag out, grounding, work space, location, purchasing standards.
- Personnel - training, including hazard identification training; experience; methods of checking machines before use; type of clothing; PPE; use of guards; tool storage; work practices; methods for cleaning, oiling, or adjusting machinery.
- Hand and Power Tools - purchasing standards, inspection, storage, repair, types, maintenance, grounding, use and handling.
- Chemicals - storage, handling, transportation, spills, disposals, amounts used, labeling, toxicity or other harmful effects, warning signs, supervision, training, protective clothing and equipment, hazard communication requirements.
- Fire Prevention - extinguishers, alarms, sprinklers, smoking rules, exits, personnel assigned, separation of flammable materials and dangerous operations, explosion-proof fixtures in hazardous locations, waste disposal and training of personnel.
- Maintenance - provide regular and preventive maintenance on all equipment used at the worksite, recording all work performed on the machinery and by training personnel on the proper care and servicing of the equipment.
- PPE - type, size, maintenance, repair, age, storage, assignment of responsibility, purchasing methods, standards observed, training in care and use, rules of use, method of assignment.
- Transportation - motor vehicle safety, seat belts, vehicle maintenance, safe driver programs.
- First Aid Program/Supplies - medical care facilities locations, posted emergency phone numbers, accessible first aid kits.
- Evacuation Plan - establish and practice procedures for an emergency evacuation, e.g., fire, chemical/biological incidents, bomb threat; include escape procedures and routes, critical plant operations, employee accounting following an evacuation, rescue and medical duties and ways to report emergencies.

SAFETY RULES

These safety rules are designed to provide employees with knowledge of the recognized and established safe practices and procedures that apply to many of the work situations encountered while employed at this organization.

It would be impossible to cover every work situation. If any employee is in doubt about the safety of any condition, practice or procedure, they must consult their immediate supervisor for guidance. Any employee that willingly disregards a safety rule may be terminated.

Accident Reporting
All accidents or near misses be reported to a manager or the Safety Coordinator immediately. Falsification of company records, including employment applications, time records or safety documentation will not be tolerated.

Hazard reporting
Employees must notify a unit manager or the Safety Coordinator immediately of any unsafe condition and/or practice.

Alcohol or Illegal drugs
No illegal drugs or alcohol will be allowed on the worksite. Employees must notify their unit manager if they are taking any prescription drugs that might affect their work performance. The use of prescribed medication will be accommodated by the company to every extent possible.

Driving
While driving a company vehicle or driving a personal vehicle for company business, employees must obey traffic laws and signs at all times. Seat belt use is required and employees must obey posted speed limits.

Lifting
When employees are required to lift an item, they should always seek mechanical means (fork lift, lift table, pallet jack, etc.) first. If an item must be lifted manually, employees will refer to the detailed lifting safety rules before performing the task.

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

Personal Protective Equipment
Appropriate Personal Protective Equipment ("PPE") must be worn at all times during hazardous operations. If an employee has any questions or needs PPE, they must notify their unit manager and reference the PPE job hazard analysis. Employees are required to wear approved eye and face protection when sawing, grinding, drilling, using air tools or performing any other task that could generate flying debris. When working with chemicals, employees must wear the required protective eyewear. Gloves will be worn when handling metal, rough wood, fiberglass and other sharp objects. Hard hats will be provided when there are overhead hazards. Appropriate footwear, long sleeved shirts, long pants, high-visibility vest, etc., should also be worn as required.

EMPLOYEE RESPONSIBILITIES
Each employee is responsible to perform tasks safely and read all safety documentation related to their assigned tasks. If an employee is not properly trained in a function, they must notify their immediate supervisor. Not all work procedures can be addressed. The following items are examples of work conditions some operating units, but are not all-inclusive.

- Do not stand on furniture to reach high places; always use a ladder or step stool.
- Use handrails when ascending or descending stairs or ramps.
- Close all drawers to cabinets after use to prevent tripping or bumping hazards.

- Keep cords neatly banded to prevent tripping hazards.
- Use extra caution when transporting glass to avoid breakage and cuts.
- Keep floors clear of water by mopping during and after watering to avoid slips and falls.
- Wear respirators when mixing and spraying chemicals.
- Wear PPE when performing hazardous operations.
- Ensure all exhaust equipment and emergency shut offs are operational prior to beginning work.

ENFORCEMENT OF SAFETY PLAN

Objective

Safety rules are provided as guidelines for safe operations. All employees must follow these rules as a condition of employment.

Scope

The Safety Plan applies to all employees and contractors.

Procedures

All employees will be given a copy of the safety rules upon initial employment. All employees must sign and return the acknowledgment form after they have been given a chance to review the safety rules and ask any questions. The Safety Coordinator will periodically review the safety rules to ensure they are applicable and current.

Enforcement

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

- Management reserves the right to impose any of the following disciplinary actions it deems appropriate:
  1. Verbal warning with documentation in personnel file.
  2. Written warning outlining nature of offense and necessary corrective action with documentation in personnel file.
  3. Termination.
- Management, including unit managers, shall be subject to the above disciplinary action for the following reasons:
  1. Repeated safety rule violations by employees under their supervision.
  2. Failure to provide adequate training prior to job assignment.
  3. Failure to report accidents and provide medical attention to employees injured at work.
  4. Failure to control unsafe conditions or work practices.
  5. Failure to maintain good housekeeping standards and cleanliness in their departments.

INJURY CLAIMS PROCEDURES

All employees must be provided with an explanation of the workers' compensation system and the benefits it will provide by their unit manager.

- In the event of a work-related injury or illness, the injured employee must report it to his/her unit manager or the Safety Coordinator before the end of the work shift.

- If the injured employee needs immediate medical attention, he/she will be driven or sent to the nearest appropriate hospital or clinic.
- If the injury is not an emergency, an appointment will be made with one of the worker's compensation provider's designated medical providers as soon as possible.
- Once a unit manager has been notified of an injury, the manager will provide a list of designated providers and written instructions. The employee must sign and date this written instruction. A copy will be maintained in personnel files and provided to the employee.
- An accident investigation will be conducted by the responsible unit manager following all work-related injuries. The unit manager or Safety Coordinator will be responsible for interviewing the injured employee and all witnesses.
- The Safety Coordinator will report the claim to the worker's compensation provider.
- If the incident involved an employee death or a catastrophe (three or more employees admitted to the hospital) the Chief Executive Officer will be notified immediately and OSHA (1.800.321.6742) must be notified within eight hours.
- The Safety Coordinator will use information from the accident investigation to identify changes that may help prevent future incidents.
- For lost time claims, the unit manager will contact the injured employee at least once a week to answer questions, keep the injured employee informed of organization activities, and discuss return to work options.
- The Safety Coordinator will contact the medical provider after each appointment to keep current on the employees work status, medical progress, and to ensure that appointments are being kept.
- Modified duty procedures will be as follows:
  1. The employee's unit manager who will determine if the employee can return to their regular job duties will evaluate the medical restrictions.
  2. If the employee is unable to return to normal job duties, the unit manager will determine if the employee's position can be temporarily modified to accommodate the restrictions.
  3. If the job cannot be modified, the Safety Coordinator will evaluate other tasks or positions the employee may be able to perform until the medical restrictions are lifted.
  4. If the employee is unable to return safely to a modified position, the medical restrictions will be re-evaluated after each doctor's visit to ensure the employee is returned to work as soon as possible.
- An entry will be made by the Safety Coordinator on an OSHA 300 Log for all cases involving medical treatment. (Employers with more than 10 employees.)
- Accurate records will be kept for all workers' compensation claims. This file will document all communications regarding the claim and all records from the medical providers and worker's compensation provider.

HAZARD COMMUNICATION POLICY

Policy

Chestnut Hill Tree Farm is committed to the prevention of hazardous material and chemical incidents that could result in injury and/or illness to any employee. The company will spare no effort in providing a safe and healthful work environment for employees and all levels of supervision will be accountable for the safety of those employees under their direction.

The Occupational Safety and Health Administration's ("OSHA") Hazard Communication standard (29 CFR 1910.1200) is based on the simple concept that employees have both a need and a "right to know" the identities and hazards of any chemicals they work with during the course of their employment. Employees also need to know what protective measures are available to prevent chemical exposures and how to avoid adverse health effects.

The following constitutes the company's written Hazard Communication program. The company will meet the requirements of OSHA's Hazard Communication standard as follows:

Container Labeling

It is the policy of the company that no container will be released for use unless it has a complete label. Unit managers will ensure that secondary containers, such as spray bottles, have complete labels. Either (1) a copy of the original manufacturer's label will be made and placed on the secondary container, or (2) the minimal information bulleted above will be placed on the container in permanent ink. The Safety Coordinator will verify that all product containers kept onsite will clearly list contents on the label:

- Product Name;
- Hazard warnings (corrosive, flammable, skin irritant, etc.); and
- Manufacturer's name and address.

Material Safety Data Sheets

Copies of Material Safety Data Sheets ("MSDSs") for all hazardous chemicals to which employees of this company may be exposed will be available on the intranet and by hard copy in each chemical area of the department in a binder designated "MSDS Sheets." Employees are required to read MSDSs for the chemicals they use. MSDSs will be available to all employees during all shifts. If an MSDS is missing, or if a new product arrives without an MSDS, employees must immediately inform the unit manager so they can call the supplier or manufacturer.

Employee Information and Training

Unit managers are responsible for conducting job specific hazard training on chemicals used by their employees. After attending training, each employee will sign a form to verify that he or she attended the training, received written materials, and understands the company policies on hazard communication. Prior to starting work, each new employee will attend a health and safety orientation and will receive information and training on the following:

- An overview of the requirements contained in OSHA's HAZCOM standard: 29 CFR 1910.1200.
- Chemicals present at the company.
- Location and availability of the company's written hazard program.
- Physical hazards and health effects of the company's hazardous chemicals.
- Methods and observation techniques used to determine the presence or release of hazardous chemicals in the work area.
- How to reduce or prevent exposure to these hazardous chemicals by using engineering controls, work practices and personal protective equipment.
- Steps the company has taken to reduce or prevent exposure to these chemicals.
- Emergency procedures to follow if an employee is exposed to chemicals.
- How to read labels and review MSDS to obtain appropriate hazard information.

Training Updates

Training shall be provided at the time of initial assignment to tasks where occupational exposure to a hazardous chemical may take place. Training shall be repeated by the Safety Coordinator whenever a new chemical or a new hazard is introduced in the work area.

Hazardous Chemicals List

Unit managers must maintain a list of all the chemicals and products used at the company within their unit. This list is kept in the front of the MSDS book. Each chemical entry on the inventory list has a corresponding MSDS available for providing specific hazard information and personal protective measures. This list must be updated quarterly by the Safety Coordinator to remove chemicals that are no longer in use at the company and to add new products.

Hazardous Non-routine Tasks

Occasionally, an employee may be asked to perform a task that is not part of their normal job. Before taking on a new task, the affected employee will be given information by their unit manager about any hazardous chemicals that might be used during the activity. This information will include:

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

Contractors

It is the unit manager's responsibility to identify and obtain MSDSs for chemicals any contractor brings into the company facilities. It is the responsibility of unit managers to provide contractors with the following information:

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

RESPIRATORY PROTECTION PROGRAM

Policy

It is the policy of the company that all employees working in areas or job classifications requiring the use of tight-fitting respirators will undergo medical evaluation and fit testing before assignment. In addition, these employees will receive training on the requirements of this program as well as specific instruction on the proper use, maintenance, and limitations of respirators.

Voluntary respirator use will be limited to the use of filtering face piece type respirators such as dust masks. All employees using filtering face piece type respirators will receive instruction on the proper use and limitations of this type of respirator by the Safety Coordinator.

Under no circumstances will employees use self-contained breathing apparatus type respirators ("SCBAs") or will employees be exposed to chemical concentrations approaching Immediately Dangerous to Life or Health ("IDLH") concentrations. All emergency situations including gas leaks and chemical spill response will be handled by local emergency response agencies in accordance with the company's emergency and incident response plan.

All expenses associated with training, medical evaluations and respiratory protection equipment will be provided and compensated by the company.

Purpose

Engineering controls, such as ventilation and substitution of less toxic materials, are the first line of defense for the company; however, engineering controls have not always been feasible for some of the company's operations, or have not always completely controlled the identified hazards. In these situations, respirators and other protective equipment must be used. When properly used, respirators are effective in protecting employees from exposure to potentially harmful substances.

To provide effective protection, respirators must be properly fitted to the individual employee and properly worn by the employee. In addition, respirators make breathing more difficult which may cause significant health problems

for individuals with existing medical conditions. This written respiratory protection program insures that employees are properly trained, fit tested, and medically cleared in order to provide maximum employee protection.

Program Administrator

The designated program administrator is the Safety Coordinator of the company. The program administrator is responsible for administering the respiratory protection program.

- Duties of the program administrator include:
  1. Identifying work areas, processes or tasks that require workers to wear respirators.
  2. Selection of appropriate respirators.
  3. Arranging for or conducting training.
  4. Ensuring proper storage and maintenance of respiratory protection equipment.
  5. Arranging for or conducting fit testing.
  6. Insuring all employees using tight-fitting respirators are medically cleared.
- Providing an approved medical provider with the following for each employee required to wear a respirator:
  1. A copy of this program.
  2. Required type and weight of respirator.
  3. Length of time required to wear respirator.
  4. Expected physical workload (light, moderate, or heavy).
  5. Potential temperature and humidity extremes.
  6. Specifications for any additional protective clothing required.
  7. Annual evaluation and updating of the written program.
  8. Recordkeeping.

Respirator Selection

The Certification of PPE Hazard Assessment outlines the work areas and job classifications where respirators are required along with the types of respirators necessary. Respiratory protection determinations for non-routine tasks and future jobs will be performed by the program administrator using the following procedures:

- Identification of the hazardous substances using material safety data sheets or other appropriate resources.
- Review of work processes to determine where potential exposures to these hazardous substances may occur.
- Employee exposure assessments utilizing air monitoring, published exposure data, or information provided by manufacturers or trade associations.
- Appropriate respirators will be selected using information from respirator vendors along with information contained in the OSHA Small Entity Compliance Guide for the Revised Respiratory Protection Standard available at www.osha.gov.
- All respirators must be certified by the National Institute for Occupational Safety and Health ("NIOSH") and shall be used in accordance with the terms of that certification. Also, all filters, cartridges, and canisters must be labeled with the appropriate NIOSH approval label. The label must not be removed or defaced while it is in use.

Medical Evaluation

Employees who are either required to wear respirators (other than dust masks) must pass a medical evaluation before being permitted to wear a respirator on the job. Any employee refusing the medical evaluation will not be allowed to work in an area requiring respirator use.

- A licensed physician or licensed health care practitioner will provide the medical evaluations. Medical evaluation procedures are as follows:
  1. The medical evaluation will be conducted using the appropriate worker compensation provider forms.
  2. All affected employees will be given a copy of the medical questionnaire to fill out during the workday, along with a stamped and addressed envelope for mailing the questionnaire to the company physician.

3. Follow-up medical exams will be granted to employees as deemed necessary by the medical clinic physician.
4. All employees will be granted the opportunity to speak with the physician about their medical evaluation, if they so request.
5. Any employee required for medical reasons to wear a positive pressure air-purifying respirator will be provided with a powered air-purifying respirator.

- After an employee has received clearance and begun to wear his or her respirator, additional medical evaluations will be provided if an employee reports symptoms such as “shortness of breath”, “dizziness”, or “wheezing”. In addition, additional medical evaluations will be performed if a change in the workplace results in an increased physiological burden on the employee.

Fit Testing

Initial fit testing is required for all employees required to wear respiratory protection. The company currently offers respirators for voluntary use; therefore fit testing is not required at this time. In the event that the company needs to change its policy, fit testing will be performed by an approved medical provider using the OSHA Qualitative Fit Test Protocol outlined in Appendix A of 29 CFR 1910.134. Employees will be fit tested with the make, model, and size of respirator that they will actually wear. Employees will be provided with several models and sizes of respirators so that they may find an optimal fit. Fit testing will be repeated annually and whenever there are changes in the employee's physical condition that could affect respiratory fit (e.g., obvious change in body weight, facial scarring, etc.).

Respirator Use Procedures

Respirators shall not be used in a manner inconsistent with their NIOSH certification or manufacturer’s instructions.

- All employees shall conduct user seal checks each time that they wear their respirator. Employees shall use either the positive or negative pressure check.
- Employees are not permitted to wear tight-fitting respirators if they have any condition, such as facial scars, facial hair, or missing dentures, that prevents them from achieving a good seal.
- Respirators shall be cleaned as often as necessary using the cleaning supplies located in the locker room.
- Employees must perform thorough visual inspections of their respirators at the beginning of each work shift.
- Worn or defective respirators will be taken out of service immediately.
- Respirators must be stored in a clean plastic bag in an uncontaminated area.
- Respirator cartridges will be dated with a permanent marker at the time they are installed on the respirator.
- Respirator cartridges will be replaced by the Safety Coordinator according to the manufacturer’s schedule.

Training Required

All respirator users and their unit managers will be trained annually by the Safety Coordinator on the contents of this respiratory protection program and their responsibilities under it, and on the OSHA Respiratory Protection standard. Employees will be trained prior to using a respirator in the workplace. Unit managers will also be trained prior to using a respirator in the workplace or prior to supervising employees that must wear respirators. Employees must demonstrate their understanding of the topics covered in the training. Training must be documented in the employee’s personnel file. The training course will cover the following topics:

- Respiratory hazards encountered at the company and their health effects.
- Proper selection and use of respirators.
- Limitations of respirators.
- Respirator donning and user seal (fit) checks.
- Fit testing.
- Maintenance and storage.
- Medical signs and symptoms limiting the effective use of respirators.

Program Evaluation

The program administrator will conduct annual evaluations of the workplace to ensure that the provisions of this program are being implemented. The evaluations will include regular consultations with employees who use respirators and their unit managers, site inspections, air monitoring and a review of records. The written program will be updated to correct any deficiencies found.

Recordkeeping

The program administrator must maintain the following records:

- A written copy of this program and the OSHA standard.
- Copies of initial and refresher training content and documentation of attendance.
- Fit test records including the make, model, and size of respirator if required.
- Copies of the physician's written recommendation regarding each employee's ability to wear a respirator.
- Copies of the results of any hazard assessments including air monitoring.

4. ACCOUNTIBILITY

Part 3.A.4.a. Floor plan of each cultivation facility or proposed floor plans for proposed cultivation facilities

i. Locking options for each means of ingress and egress;
ii. Alarm systems;
iii. Video surveillance;
iv. Name and function of each room; and
v. Layout and dimensions of each room.

1/16" 8' 16' 32' 1/8" 4' 8' 16' 1/4" 2' 4' 8' 1 1/2" 6" 1' 2' 3" 6" 1' 2'

H G F E D C B A

1 2 3 4 5 6 7 8 9

1

[redacted]

A

[redacted]

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Part 3.A.4.b. Storage

i. Safes;
ii. Vaults; and
iii. Climate control.

[redacted]

[redacted]

[redacted]

Chestnut Hill Tree Farm intends to grow cannabis, manufacture, and distribute Derivative Products, which are controlled substances with many incentives for diversion. Supply chain security is a top priority of the company and a primary job duty of all employees, reinforcing a company-wide culture of responsibility. The Director of Security will be responsible for the development and implementation of the anti-diversion policies and procedures, with managers responsible for oversight at each facility.

Diversion includes, but is not limited to employee or third-party theft or transfer of medical cannabis products by an employee, patient, or caregiver to an unqualified individual. Best practice dictates that the company demonstrates control and security over its controlled substances inventory. The company has adopted multiple policies and procedures to prevent diversion and trafficking of the controlled substances they produce. Anti-diversion protocols paired with strict security and recordkeeping protocols will ensure that all medical cannabis materials are controlled throughout their life cycle.

Chestnut Hill Tree Farm will implement comprehensive policies and procedures to be implemented by the organization in order to ensure the prevention of diversion, abuse, and other illegal or unauthorized conduct relating to medical cannabis products. Specifically all cannabis materials and medical cannabis products will be stored in such a manner as to prevent diversion. The company will have a robust security system that prevents and detects diversion, theft, or loss of cannabis and medical cannabis products.

Specific considerations regarding anti-diversion measures include methods for increased patient accountability along with methods for identifying, recording, and reporting diversion, theft, or loss, and for correcting all errors and inaccuracies in inventories.

BIOTRACKTHC

Upon propagation, BioTrackTHC automatically assigns a globally unique non-repeatable 16-digit barcode number to every plant. This barcode follows the plant through its entire product life cycle. The system will also track the precise location of every given plant within a designated room, bed or plant table using an ‘abc, 123’ grid base. Throughout the production process, the licensed producer may enter production notes into the plant-specific inventory record (i.e. events or any required notations that do not currently have pre-defined fields within the system). Upon harvest the system will batch designated plants together and assign a unique barcode to the collection, although the plants are grouped together during the harvest the individual plant barcodes are associated and cataloged within the batch inventory details. All flower, waste, sugar leaf, and other material will be collected, measured and associated appropriately to the original plant barcodes. These weights are also entered using vertically integrated scales to diminish the possibility of human error or manual manipulation. The system can also record both the wet and dry weights of flower material to track moisture loss percentages. The product can be notated and sampled at this juncture for testing purposes. Once testing results are retrieved, they can be directly associated with the product batches.

SPECIFIC DIVERSION PREVENTION PROCEDURES

EMPLOYEE BACKGROUND CHECKS

The company will not employ anyone with a history of theft or diversion based on a background check report. All employees will receive a Level 2 background check prior to employment. If an employee is identified who post-employment has been convicted of a felony involving theft or diversion or any felony of sale or possession of drugs, narcotics, or controlled substances, he or she will be terminated.

EMPLOYEE TRAINING
Extensive training of all employees will ensure that all staff is both knowledgeable of security and diversion issues and properly trained to comply with all required security measures.

ACCESS TO FACILITIES
No person, except a company employee, shall be allowed on the premises of any company facility unless they are an authorized visitor and escorted by an employee at all times.

EMPLOYEE ACCESS TO MEDICAL CANNABIS PRODUCTS
Access to cultivation areas is restricted to employees and regulators and based on their granted level of security access. Access to each separate functional area is granted to an employee based on his or her experience, tenure, and level of responsibility. Only manager level employees have access to cure and storage areas. All plant material from propagation to the transfer to manufacturing is tracked throughout the cultivation process. Transfers of cannabis must be:

- Approved by a director level employee,
- Fully documented in the inventory control system and by camera surveillance, and
- Limited to the internal manufacturing unit. No usable plant material may ever leave the production facility.

VISITORS ACCESS TO MEDICAL CANNABIS
Visitors will be handled in accordance with the company's visitor policies and procedures. Visitors will always be accompanied by authorized personnel and will never be granted access to cannabis materials or medical cannabis product storage areas unless required for provision of services.

All persons who are not employees, certified patients, or designated caregivers, but who have been authorized by management to enter the facility shall obtain a visitor identification badge from a facility employee prior to entering the facility. An employee will escort and monitor the visitor at all times while the visitor is in the facility. The visitor identification badge shall be visible at all times. The facility will require the visitor to return the identification badge upon exiting the facility.

Each facility will maintain a visitor log, which shall include the name of the visitor, date, time and purpose of the visit. The visitor log shall be available to the OCU and law enforcement at all times during operating hours and upon request.

If an unforeseen circumstance requires the presence of a visitor and makes it impractical for a facility to obtain prior authorization from the OCU, the facility shall record in the visitor log, the name of the visitor, date, time, purpose of the visit and the facts upon which the access was granted.

INVENTORY MANAGEMENT AND POINT OF SALE SYSTEM
The inventory management and point of sale system provides additional opportunities to increase control over cannabis and medical cannabis products. Managers will review entries and transactions in accordance with the specific schedule set in their department.

ENVIRONMENTAL SCANNING

The Director of Security will regularly review information from external sources including law enforcement, trade and patient associations, advocacy groups, list serves, and patients and caregivers related to factors that may impact the incentive for diversion (i.e. system-wide shortages, changes in law, rapidly increasing patient registrations, etc.). If the Director of Security concludes that a change in diversion risk based on environmental factors exists, a risk mitigation plan must be developed and implemented.

PACKAGING AND LABELING

Medical cannabis products will be packaged in child-resistant and tamper-proof or tamper-evident, light-resistant unit-dose (i.e. 1g concentrate or 50g CBD vape pen) packaging. For deliveries from the manufacturing facility to the dispensing facility, tamper-proof tape and single-use identification coding will be used to secure containers. All packaging and labeling must be in accordance with company policies and procedures for packaging, labeling, product storage, and delivery.

RECEIVING MEDICAL CANNABIS PRODUCTS

Two employees, one being a Security Officer, are required to receive any medical cannabis products into inventory at any location. The entire transaction will be monitored by the Director of Security. Each employee must confirm by signature the accuracy of the delivery invoice, identification numbers, number of containers, the total inventory count received, and the accuracy of the entry of the inventory into the inventory management system in accordance with the inventory management policies and procedures.

REPORTING SUSPECTED OR KNOWN INCIDENTS OF DIVERSION

The Chief Executive Officer will investigate any suspected report of diversion of cannabis materials or products. The Chief Executive Officer will report any verifiable incident of diversion of cannabis materials or products to law enforcement as needed. All company employees must report the unauthorized diversion of cannabis materials or products to the appropriate supervisor immediately. Diversion of cannabis materials or products may be cause for termination.

STORAGE OF EXPIRED AND DISPOSED MEDICAL CANNABIS PRODUCTS

All medical cannabis products awaiting disposal will be stored in a locked container, in a secure area, recorded, and disposed of in accordance with the company's waste disposal policies and procedures.

[redacted]

Emergency Contacts

Emergency contacts will be posted at every facility. Phone numbers for the alarm company, surveillance company, fire department, police department, spill response team, poison control center, OCU contact, and 911 will be posted and updated as needed.

Changes to Security Plan

Any local law enforcement or OCU security directives will be incorporated into the security plan. Any changes to security protocols must be reviewed, approved by the Chief Operating Officer, and documented. Any changes must also be distributed to employees and re-training must be scheduled as soon as possible if required.

Communication with Law Enforcement

The Director of Security must maintain a list of non-emergency police department contacts for each facility. The Director will maintain regular communication with each contact advising of any changes in security procedures. The company intends to develop strong partnerships with local law enforcement agencies. The Director of Security will engage these agencies to support the company's security plans through collaborative training, observation patrols, rapid response to incidents, and proactive meetings.

Reporting Required

All employees are required to report any of the following incidents to their supervisor or the Director of Security. The Director will report such incidents to law enforcement and the OCU as necessary:

- An alarm activation or other event that requires a response by public safety personnel;
- The failure of any security alarm system due to a loss of electrical power or mechanical malfunction;
- Discrepancies identified during inventory, diversion, theft, loss, and any criminal action involving owners, managers, or employees;
- Unauthorized destruction of cannabis;
- Any loss or unauthorized alteration of records relating to cannabis inventory, patients, caregivers, or employees; and
- Any other breach of security that may present a continued threat.

Equipment Maintenance

The Director of Security must schedule and oversee all maintenance of security equipment in accordance with manufacturer recommendations. Any equipment failure identified must be corrected as soon as possible. All security equipment will be in good working order and will be inspected and tested at regular intervals.

ROBBERY PREVENTION MEASURES

Each facility and transportation vehicle is a high value target for burglars and robbers. A robbery in progress is an Incident and must be handled in accordance with this plan. The most effective way to ensure the safety and security of employees and patients is utilizing prevention strategies. All employees are required to have a good working knowledge of this Security Plan and to implement prevention measures into daily activities. Transportation of cannabis must be performed in accordance with transportation procedures.

[redacted]

Cash Management

- Each employee handling cash must be trained in the types of related incidents related to cash and is required to handle cash in accordance with the company's cash management and accounting procedures.
- The Chief Operating Officer is responsible for the development and implementation of cash management procedures.

INFORMATION TECHNOLOGY SECURITY

The IT Director is responsible for ensuring the security of the company's hardware, software, data, and communications networks. The Director is responsible for all IT maintenance including software registration, security patches, malicious software prevention, account management, security status, and network access monitoring, disposal and redeployment, employee IT security training and vulnerability assessments. All employee passwords for software and network access must be changed every six months. The IT Director will ensure system required password changes. Access to protected information must be restricted to essential personnel only. Examples of protected information include:

- Security and cash management procedures,
- Asset and inventory lists,
- Network data,
- Floor plans of critical areas,
- Password and code records,
- Patient and caregiver records, and
- Employee records.

The IT Director is required to identify and respond to all cyber security incidents. Incidents include natural disasters impacting technology infrastructure and unauthorized network access exposing protected information.

EMERGENCY & INCIDENT RESPONSE PROTOCOLS

Chestnut Hill Tree Farm has established procedures for addressing emergencies and incidents including natural disasters, fire, unauthorized facility access, theft, of cannabis products or release of confidential information. Provisions for emergency and incident management, containment, and corrective measures are thoroughly detailed. The Chief Operating Officer is assigned responsibility for confirming the occurrence of an incident requiring the execution of this protocol and for ensuring the response protocol is followed.

The Director of Security will immediately notify appropriate law enforcement authorities within twenty-four hours after the discovery of a reportable incident. All incident response and emergency activities will be documented. All documentation related to a reportable incident will be maintained for no less than five years and made available, upon request, to OCU and to law enforcement authorities acting within their lawful jurisdiction.

The primary emphasis of activities described within this protocol is the return to a normalized (secure) state as quickly as possible, while minimizing adverse impacts to the company. The company's plan addresses incident identification, response protocols, containment activities, and corrective measures.

RESOURCES

Ready.gov
National Fire Protection Association

INCIDENT IDENTIFICATION & TRAINING

Types of Emergencies and Incidents

Types of incidents include, but are not limited to:

- Theft or physical loss of cannabis products or confidential records;
- Robbery or unauthorized entry to the facility;
- Threats of violence to the facility, personnel or visitors; or
- Other incidents including:
    1. Bomb threats
    2. Fires
    3. Earthquakes
    4. Hazardous Materials Release
    5. Floods
    6. Windstorms
    7. Civil Disturbances
    8. Pandemic Flu
    9. Serious Accidents or Health Emergencies
    10. Criminal Activity

Incident Training Required

All employees must be required to receive incident management training upon hiring and annually in accordance with the staffing and training policies of the company. The Chief Operating Officer must ensure the adequate training of employees. Third-party trainers may be utilized as necessary.

ROLES & RESPONSIBILITIES

Employee Responsibilities

- Each employee must be familiar with the contents of this plan and must know the location of alarms, utility cabinets, fire extinguishers, emergency exits and first aid supplies.
- In the case of fire, if trained and safe to do so, extinguish the fire using a portable fire extinguisher.
- If a manager is not available to make an evacuation decision, all employees must make a determination with the health and safety of employees and visitors as the primary consideration.
- A gas leak in the production facility requires an evacuation until the fire department clears the facility.
- Do not re-enter the building or allow others to re-enter during an emergency. Stay with customers and other evacuated employees until interviewed by the unit manager or general manger.
- Each unit manager must maintain and visibly post a current emergency contact list and evacuation plan. All employees should save emergency contact numbers in their company or personal cell phones.
- Each unit manager must pre-plan an evacuation route, maintain and post the evacuation route map based on familiarity with the building and customer safety. Every employee must know the evacuation route and the location of the map. Always take the nearest stairwell.
- Regular review of facility floor plans and evacuation plan maps must be completed by the unit manager and updated as necessary.

Chief Operating Officer Responsibilities

To ensure an appropriate and timely execution of appropriate incident response, the Chief Operating Officer must:

- Develop and maintain this plan continuously. Identify potential hazards, develop mitigation strategies and improve the response protocols accordingly. Update unit managers and training programs as needed. Each facility must be stocked with an emergency preparation kit including provisions for sequestration in the facility if required.
- Maintain an updated emergency notification contact list. Maintain an internal contact list and employee notification system via email and text messaging.
- Visibly post all evacuation routes. Ensure all environmental detectors and alarms, emergency lighting and exit signs are operational.
- Confirm the occurrence of an incident requiring the execution of this protocol.
- Secure all products following any instance of diversion, theft or loss of cannabis and conduct an assessment to determine whether additional safeguards are necessary.
- Collect any evidence supportive of the event (unless law enforcement is required and collects evidence).
- Supervise and direct the consistent, timely and appropriate response to an incident.
- Provide appropriate communication to parties having a vested interest in the incident.
- Offer support to employees, customers or other interested parties as appropriate until the incident is resolved.
- Conduct a post-incident review and report making any necessary adjustments to security measures and procedures.

PROTOCOLS

Guidelines for All Employees

Reports of emergencies and incidents may come from outside parties, customers, other employees, news sources, direct observation or other sources. The primary objective for all employees is to determine if the problem being reported is an incident. In most instances, the problem being reported will not constitute an incident as defined within the protocol. However, the protocol can be a good guideline for dealing with other minor issues. No set of protocols will address every circumstance; all employees must in good faith take all necessary and responsible actions.

Receiving External Reports

All employees are accountable for asking necessary questions about an incident, making a reasonable attempt at determining if an incident has occurred, recording facts and responses to questions and forwarding pertinent information to the unit manager or Chief Operating Officer immediately. If the employee cannot reach the managers, the Chief Executive Officer must be contacted. Duties include, but are not limited to:

- Familiarity with this protocol and the appropriate procedures.
- Individuals reporting problems and/or incidents to an employee should be informed as to the reason for the questions and all individuals should be encouraged to openly discuss the problem being reported.
- Any information provided by an individual that helps in the determination is of considerable value; the individual's cooperation is critical, greatly appreciated and should be recognized by the employee receiving the report.

Discovery and Internal Reporting

If the situation indicates that an incident may have occurred, employees should assume that an incident has actually occurred and perform the following activities:

- Obtain and record the contact information for the individual reporting the problem (name, telephone numbers and email address).
- Record relevant information about the incident (e.g., time/date of suspected occurrence, type of information compromised, location of the compromise) in the Incident Report Log.
- Inform the individual to expect contact from a member of management.
- Request the individual to treat the incident as a confidential matter.
- Notify the unit manager or Chief Operating Officer immediately of the incident.

Assessment and Escalation

Except in the case of an emergency needing immediate attention, the Chief Operating Officer will determine the category and severity of the incident and undertake discussions and activities to best determine the best course of action. All discussions, decisions and activities are to be documented as described herein. The Chief Operating Officer is responsible for making an early determination if an incident has occurred or might be indicated. If the employee cannot reach the unit manager or Chief Operating Officer, the Chief Executive Officer must be contacted as soon as possible.

Notification and Communication

The Chief Operating Officer will take action to notify the appropriate internal and external parties as necessary.

- Internal notification – the Chief Operating Officer will notify the Chief Executive Officer of an incident as soon as possible and then must notify other employees as necessary.
- External notification – unless responders must be notified in an emergency, all external notifications and communications must be approved by the Chief Executive Officer. External parties may include regulators, suppliers, customers, media or other affected parties.

Containment

The Chief Operating Officer, with the Chief Executive Officer if available, will determine and cause to be executed and the appropriate activities and processes required to quickly contain and minimize the immediate impact to personal safety, the company, customers and other affected parties. Containment activities are designed to:

- Minimize harm to individuals.
- Counteract the immediate threat.
- Prevent propagation or expansion of the incident.
- Minimize actual and potential damage.
- Restrict knowledge of the incident to authorized personnel.

- Preserve information relevant to the incident.

Corrective Measures

The Chief Executive Officer and Chief Operating Officer will determine and cause to be executed necessary activities in order to quickly restore circumstances to a normalized and secure state of operation. Corrective measures should be designed to:

- Secure the environment.
- Restore the environment to its normalized state.

Notification Required

Any employee with knowledge or a reasonable suspicion of an incident (i.e. theft or diversion) is required to make an immediate report to their unit manager, Director of Security, or Chief Operating Officer and record the incident in the incident report log. All incident activities, from receipt of the initial report through post-incident review, are to be documented by the Chief Operating Officer.

Internal Reporting Required

Reporting must include:

- A summary of the incident providing a general description of events, approximate timelines, the parties involved, resolution of the incident, external notifications required and recommendations for prevention and remediation.
- A description of incident events, indicating specific timelines, persons involved, hours spent on various activities, impact to affected parties, ensuing discussions, decisions and assignments made, problems encountered, successful and unsuccessful activities, notifications required or recommended, steps taken for containment and remediation, recommendations for prevention and remediation (short-term and long-term), identification of policy and procedure gaps, results of post-incident review.
- All relevant documentation will be retained by the Chief Operating Officer for archival in a cloud storage repository. Access to the documentation and repository is typically restricted to executive management and unit managers.
- Incidents must be documented by the Chief Operating Officer in accordance with the company's recordkeeping policies.

OCU and Law Enforcement Reporting Required

The Chief Operating Officer will immediately notify the OCU and appropriate law enforcement authorities as necessary after discovering the following:

- Discrepancies identified during inventory, diversion, theft, loss and any criminal action involving an owner, manager, or an employee that cannot be explained;
- Any suspicious criminal act involving the sale, cultivation, distribution, processing, or production of cannabis by any person known to the company;
- Unauthorized destruction of cannabis;
- Any loss or theft of cannabis products during transportation;
- An alarm activation or other event that requires response by public safety personnel; and
- Any other major breach of security.
- All documentation related to an incident that is reportable must be maintained and made available to the OCU and to law enforcement authorities acting within their lawful jurisdiction upon request.

Post-Incident Review

A final review of incident-related activities is required.

- The Chief Operating Officer will hold a post-incident review meeting after each incident has been resolved; this discussion should be scheduled within 2-3 weeks of the incident's remediation. All affected parties are recommended participants.
- The review is an examination of the incident and all related activities and events. All activities performed relevant to the incident should be reviewed with an eye towards improving the over-all incident response process.
- Recommendations on changes to policy, process, safeguards, etc. are both an input to and by-product of this review. All discussion, recommendations and assignments are to be documented for distribution to the Chief Executive Officer and follow-up by the Chief Operating Officer.

Incident Closure

The Chief Operating Officer will stay actively engaged throughout the life of the incident to assess the progress/status of all containment and corrective measures and determine at what point the incident can be considered resolved. Recommendations for improvements to processes, policies, procedures, etc. will exist beyond the activities required for incident resolution and should not delay closing the incident, but will be implemented by the Chief Executive Officer.

CONTAINMENT ACTIVITIES

Incident Containment

The Chief Operating Officer will determine and execute the appropriate activities and processes required to quickly contain and minimize the immediate impact to the company, our customers and other stakeholders. The information below is a guideline for response and containment in various situations; however, all employees must use their best judgment when determining appropriate actions during an emergency incident. The health and safety of all persons must be the primary driver of any decision. Containment activities are designed with the primary objectives of:

- Counteracting the immediate threat.
- Preventing propagation or expansion of the incident.
- Minimizing the actual and potential damage.
- Restricting knowledge of the incident to authorized personnel.
- Preserving information relevant to the incident.

Fire

If the fire does not present an immediate danger to personal safety, one employee may try to extinguish the fire while one other employee stands-by, calls 911 and directs others out of the facility.

Natural Disasters

- Determine the extent of the disaster and need for evacuation or sequestration.
- Follow any direction given by local officials or law enforcement.
- Terminate all non-essential work functions and post necessary closure notices.
- Take precautions to secure all cannabis products from the environment or possible looting.

Chemical Spill/Gas Leak

Chestnut Hill Tree Farm does not utilize any highly toxic chemicals in its operations. Gas leaks in any facility require an immediate evacuation until the fire department clears the facility. Gas leaks may include natural gas, CO_2, or propane. Any employee discovering a gas leak should shut off the gas source immediately and notify the unit manager to begin evacuation procedures. Nutrient spills are addressed in the cultivation policies. Employees should follow the direction of local officials in the case of an external spill impacting operations.

Evacuation Protocols

Any manager may determine the need to evacuate an area. Any employee is authorized to evacuate an area in a life threatening incident. Reasons for evacuation may include:

- Fire.
- Bomb threat.
- A hostile or violent employee, customer, visitor or unknown person.
- Power outage.
- Earthquake.
- Water or gas leak.
- Hazardous chemical spill.
- Robbery or hostage situation.

All employees must ensure that patients and visitors do not:

- Use elevators.
- Gather in lobbies.
- Bring disabled individuals into stairwells without fire department approval.
- Open a door without first checking for heat.
- Run or panic.
- Re-enter the building until authorized.

Disabled individuals or others who need assistance should:

- Be assisted by an employee.
- Be evacuated only under the direction of authorized emergency personnel or when there is an immediately threat to personal safety and security (i.e. Fire Department).

If applicable, preserve any and all evidence, if applicable and remain accessible for discussion with law enforcement personnel. Request witnesses to stay or provide their contact information. Do not touch any suspicious items or suspected bombs.

Damaged Cannabis Products

Each unit manager in coordination with the Quality Assurance Officer must ensure that cannabis materials or cannabis products that have been subjected to improper storage conditions, including, without limitation, extremes in temperature, humidity, smoke, fumes, pressure, age or radiation due to natural disasters, fires, accidents or equipment failures, are not salvaged and distributed and are disposed of in accordance with the company's waste disposal policies. The unit manager may conduct salvaging operations only if there is:

- Evidence from laboratory tests and assays that the cannabis or cannabis products meet all applicable standards of identity, strength, quality and purity; and
- Evidence from inspection of the premises that the cannabis or cannabis products and their associated packaging were not subjected to improper storage conditions as a result of the disaster or accident, if any.

[redacted]

UNAUTHORIZED IT ACCESS OR NATURAL DISASTERS IMPACTING PRODUCT OR EQUIPMENT

Activities that may be required to contain the threat presented to systems where unauthorized access or a natural disaster may have occurred. Engage a third-party IT specialist as needed.

[redacted]

CORRECTIVE MEASURES

Chief Operating Officer Responsibilities

The Chief Operating Officer will determine and cause the execution of the appropriate activities and processes required to quickly restore circumstances to a normalized (secure) state. Third-party security, IT or other necessary advisors should be engaged if necessary. Corrective measures are designed with the primary objectives of:

- Securing the environment, and
- Restoring the environment to its normalized state.

[redacted]

[redacted]

FACILITY CLOSURES

The Chief Operating Officer must manage any required facility closures ensuring that:

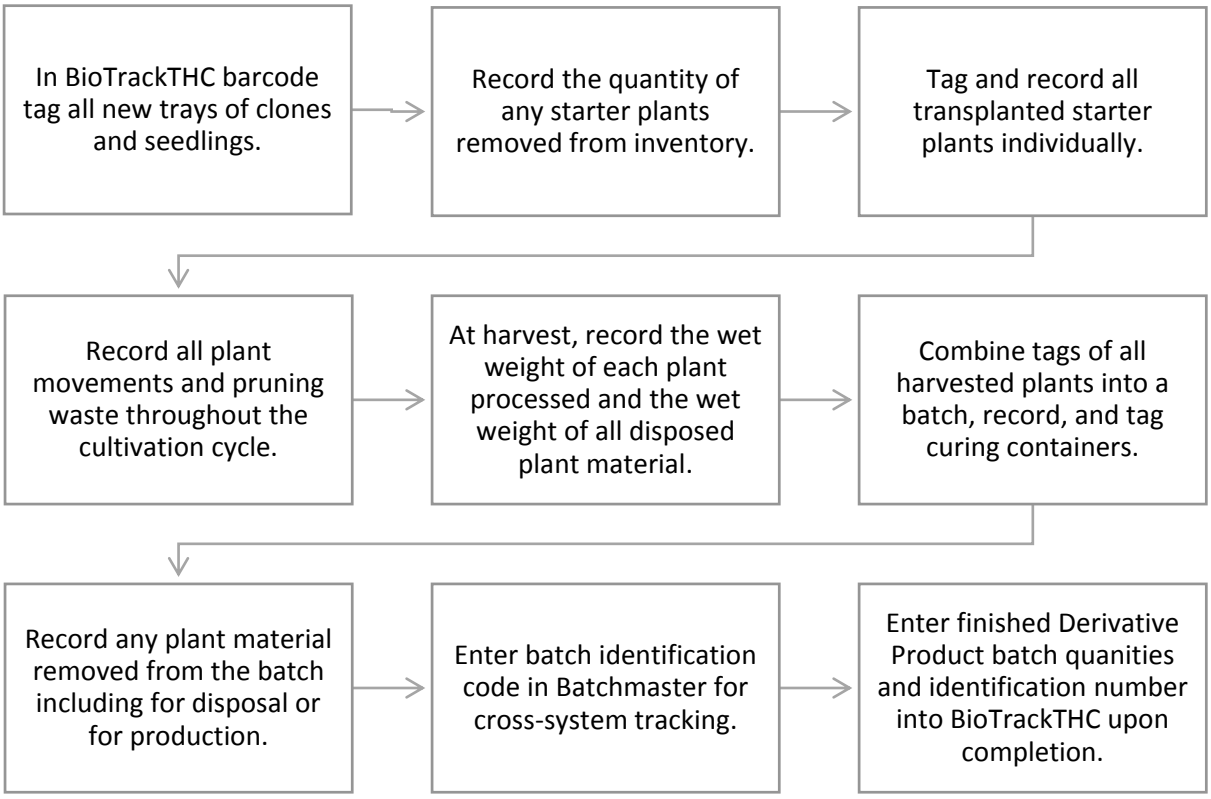
- Essential services are maintained to the extent possible even during an emergency.
- Minimum staffing levels are maintained.
- Required stakeholder communications are issued.
- An action plan for provision of essential services restoration of full services is developed and implemented immediately.
- A common area with food and bedding is provided for employees required to perform extended duty.
- Offsite employees support administrative tasks (time entry, scheduling, etc.).
- Non-essential meetings and travel is suspended.
- Telecommuting is implemented for applicable job functions.
- Sufficient and accessible infection control supplies (e.g. hand-hygiene products, tissues and receptacles for their disposal) are provided in all facility areas. Surface cleaning in common areas is sufficient.
- Work is re-prioritized and suspended if possible and contingency plans for major projects are implemented if possible.
- Essential operations are maintained, emergency assignments may be made to non-typical job classifications or third-parties as necessary.

BIOTRACKTHC

Upon propagation, BioTrackTHC automatically assigns a globally unique non-repeatable 16-digit barcode number to every plant. This barcode follows the plant through its entire product life cycle. The system will also track the precise location of every given plant within a designated room, bed or plant table using an 'abc, 123' grid base. Throughout the production process, the licensed producer may enter production notes into the plant-specific inventory record (i.e. events or any required notations that do not currently have pre-defined fields within the system). Upon harvest the system will batch designated plants together and assign a unique barcode to the collection, although the plants are grouped together during the harvest the individual plant barcodes are associated and cataloged within the batch inventory details. All flower, waste, sugar leaf, and other material will be collected, measured and associated appropriately to the original plant barcodes. These weights are also entered using vertically integrated scales to diminish the possibility of human error or manual manipulation. The system can also record both the wet and dry weights of flower material to track moisture loss percentages. The product can be notated and sampled at this juncture for testing purposes. Once testing results are retrieved, they can be directly associated with the product batches.

Propagated cannabis source material is tracked in the same way all other inventory is tracked. A detailed description of inventory control policies is provided in the following section. The following graphic illustrates the data entry points required for all crops in the cultivation facility.

Table 3: BioTrackTHC Entries Required in the Cultivation Process



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INVENTORY CONTROL

The Chief Operating Officer is assigned responsibility for the oversight of all inventory management activities and for implementing and enforcing the company's policies and procedures. All managers will work collaboratively to assure that inventory is tracked from seed to sale, counted and recorded at required intervals, and that any discrepancies are reported to the appropriate authorities.

The company's inventory management and point of sale systems will be accurate and capable of producing, upon request, reports on all cannabis and products in production, finished and stored. Cycle counts are required and will be recorded in the inventory log. Required shift, daily, weekly, monthly, semi-annual, and annual inventory counts in the dispensary, cultivation, and manufacturing facilities will be executed. All inventory policies and procedures relevant to the acquisition, receipt and distribution of cannabis are comprehensively addressed.

Discrepancies identified during inventory counts that are not due to documented causes will be reported to the Chief Operating Officer and the causes will be investigated. Any suspected cases of diversion, theft, loss, and any criminal action involving the company or an employee will be reported to the Chief Operating Officer. The Chief Operating Officer will also report any verifiable incident of theft or loss of cannabis to the OCU and law enforcement, as necessary.

RESPONSIBILITY FOR INVENTORY CONTROL

- The Chief Operating Officer is responsible for oversight of all inventory management and control.
- The Chief Operating Officer shall designate in writing an employee who has oversight of the inventory control system for each licensed company facility under the Inventory Manager's supervision.
- Unless otherwise designated by the Chief Operating Officer, each unit manager is responsible for the accurate recording of all inventory transactions in their unit.

INVENTORY LIMITS

- The Chief Operating Officer must ensure the cumulative inventory cannabis materials is maintained in accordance with regulations.

- Beginning inventories for each unit shall be established based on demand projected in the business plan of company.
- Inventory limits shall be adjusted by the Chief Operating Officer in coordination with the unit managers to anticipate future inventory needs.

REAL-TIME INVENTORY REQUIRED

- The Inventory Manager, in coordination with the unit managers, is responsible for the accurate real time reporting of cannabis inventory.
- The system utilized in each location must report daily beginning and ending inventory including:
    1. Cannabis plants in any phase of development such as propagation, vegetation and flowering;
    2. Cannabis ready for dispensing;
    3. Cannabis products in process;
    4. Cannabis products ready for dispensing;
    5. All damaged, defective, expired or contaminated cannabis and cannabis products awaiting disposal;
    6. Acquisitions;
    7. Harvests;
    8. Sales;
    9. Disbursements; and
    10. Disposals of unusable cannabis.

INVENTORY CONTROLS AND PROCEDURES

- The Chief Operating Officer in coordination with the Inventory Manager and unit managers shall regularly conduct inventory reviews and comprehensive inventories of all cannabis and cannabis products in production, finished and stored.
- The Quality Assurance Officer will recommend and help implement quality control measures for receiving.
- A seed-to-sale methodology must be utilized by the company at all times.
- The Chief Operating Officer shall make all necessary changes to procedures and re-train personnel immediately upon discovering a problem in inventory management procedures.
- Each unit manager shall maintain an inventory log to record:
    1. The date of an inventory process;
    2. A summary of the inventory findings; and
    3. The names, signatures and titles of the individuals who conducted the inventory.

INVENTORY RECORDKEEPING

- The Inventory Manager must oversee the documentation of all inventory procedures in coordination with the unit managers to be reviewed by the Chief Operating Officer.
- The company will utilize a cloud based document management system and server based inventory control system, BioTrackTHC.
- All inventory documentation required must be retained by each facility for at least five years.
- Records will be made available to the OCU upon request as required.

RECEIVING

RECEIVING CANNABIS AND CANNABIS PRODUCTS

- Immediately upon arrival to any company facility, two employees, designated by the unit manager as able to receive inventory, must re-weigh, re-inventory and account for on video and in the inventory system all cannabis and cannabis products.
- Containers should be physically examined for evidence of tampering.
- Any products that show evidence of tampering or that are not accompanied by the appropriate documentation must be rejected and may not be received into inventory.
- The unit manager must be notified immediately of any shipment refused or that needs to be returned.
- Each employee must confirm by signature the accuracy of the delivery invoice, identification numbers, number of containers, the total inventory count received and the accuracy of the entry of the inventory into the inventory management system or point of sales system.
- All cannabis product must be accompanied by the name and license number of the cultivation facility, the lot number, net weight, associated laboratory test results, and a list of all pesticides applied to the product.

DISCREPANCIES

- Any discrepancy must be reported to the unit manager immediately to be investigated and resolved with the originator of the shipment.
- Unresolved discrepancies must be reported to the Inventory Manager as required by the company's recordkeeping policies and procedures.

RECEIVING PRODUCT INTO THE POINT OF SALE SYSTEM

- Receipt of cannabis, cannabis products and cannabis plants must be recorded in the inventory control system.
- The following information must be recorded:
    1. The quantity and sizes of all containers received;
    2. A description of the cannabis products acquired, including the amount, strain and batch number and all testing data provided;
    3. The name and identification number of the license of the facility shipping the cannabis products;
    4. The name and identification card number of the employee delivering the cannabis products;
    5. The name and identification card number of the employee receiving the cannabis products on behalf of the unit; and
    6. The date of acquisition.

CULTIVATION INVENTORY

- The cultivation manager or their designated employee, must record at a minimum the following information for each cannabis plant:
    1. The plant identification number;
    2. Whether the plant originated from cannabis seeds or cannabis cuttings;
    3. The strain of the cannabis seeds or cannabis cuttings;
    4. The date on which the cannabis seeds or cuttings were planted; and
    5. A cumulative list of all chemical additives used in the cultivation, including, without limitation, nonorganic pesticides, herbicides and fertilizers.
- The harvest records for each batch compiled through the harvest process must include without limitation:
    1. The date of harvest and batch identification;
    2. The number of cannabis plants in the batch;

3. The final yield weight of processed usable cannabis and waste; and
4. The name and identification card number of the employee responsible for the harvest.

INVENTORY COUNTS

Cycle Counts Required

- The Chief Operating Officer shall direct unit managers to perform inventory counts on a regular basis utilizing a cycle count method.
- A cycle count requires the unit manager perform a complete count of the inventory over a period of time counting inventory groups (i.e. clones, mothers, flowering by room, finished flower, curing flower, edibles, topicals, etc.) individually.
- Each unit manager shall ensure that cycle counts are completed on schedule with minimal possible impact on regular operations.
- The same employees shall be assigned to recurring inventory groups whenever possible. However, employees should not consistently be responsible for one inventory area.
- The unit manager must review any discrepancies and approve all inventory management system adjustments.
- Discrepancies identified during inventory, diversion, theft, loss and any criminal action involving company or an employee; must be reported to the Chief Operating Officer and the OCU in accordance with the company's recordkeeping policies.
- All counts must be recorded in an inventory log and entered into the inventory management system or point of sale system immediately if counted on paper or by recording device.

Required Counts in the Cultivation Facility

- Shift counts – new plantings and clones propagated and all plants removed from cultivation to waste or harvest
- Daily counts – bulk cannabis storage containers if inventory was transferred from the container that day and all in process cannabis plants
- Weekly counts – bulk flower containers, vegetative plants, and flowering plants and total in waste containers
- Monthly counts – complete inventory
- Semi-annual counts – complete inventory with second count
- Annual counts – complete inventory with second count witnessed by the Inventory Manager

REPORTING

Inventory Discrepancies

- If the unit manager identifies a reduction in the amount of cannabis in the inventory of the cannabis establishment not due to documented causes, it must be reported to the Inventory Manager and Chief Operating Officer.
- The Inventory Manager in coordination with the unit manager shall determine where the loss has occurred and take and document corrective action.
- If the reduction in the amount of cannabis in the inventory is due to suspected criminal activity by an employee, the Chief Operating Officer shall report the employee to the appropriate law enforcement agencies as required by regulation.

Theft and Loss

- If any loss or theft is verified, it must be documented by the Chief Operating Officer and reported to the local enforcement agency and OCU as necessary by regulation or at the Chief Operating Officer's discretion.

- Documentation of the theft or loss must be maintained for at least five years and provided to law enforcement or the OCU upon request.

CANNABIS PRODUCT STORAGE

The inventory management system must be used to document cannabis and cannabis products in storage. Product storage requirements established by the company are thoroughly addressed, with measures included to ensure adequate lighting, ventilation, temperature, humidity, space, and equipment. Separate areas for storage of cannabis that is outdated, damaged, deteriorated, mislabeled, or contaminated, or whose containers or packaging have been opened or breached, are identified and described.

The Chief Operating Officer will be responsible for developing, implementing and maintaining storage area procedures for each unit that ensure compliance with required processes contained herein. Each unit manager is responsible for establishing control areas or systems to prevent product contamination during the production process. The four secure storage locations used during cultivation processing are discussed and those with access are listed.

It is established that all storage areas will be maintained in a clean and orderly condition, free from infestation by pests of any kind and in accordance with security requirements established by the company. All safes, vaults, and any other equipment or areas used for the production, cultivation, harvesting, processing, or storage of cannabis and cannabis products will be securely locked and protected from entry at all times. [redacted]

PRODUCT STORAGE

General Storage Requirements

The Chief Operating Officer in coordination with unit managers and quality control unit is responsible for ensuring compliance of all storage areas.

- All cannabis and cannabis products must be stored in an enclosed and locked facility where no toxic or flammable materials are kept.
- Adequate lighting, ventilation, temperature, humidity, space, and equipment must be provided in all cannabis and cannabis product storage areas with oversight by the quality control unit.
- Separate areas for storage of cannabis that is outdated, damaged, deteriorated, mislabeled, or contaminated, or whose containers or packaging have been opened or breached, until such products are destroyed must be provided in each unit.
- All storage areas must be maintained in a clean and orderly condition.
- All storage areas must be kept free from infestation by insects, rodents, birds, and pests of any kind.
- All storage areas must be maintained in accordance with security policies and procedures.

Secure Product Storage Required

The Chief Operating Officer in coordination with the Director of Security and unit managers shall be responsible for monitoring and restricting access to secure storage of cannabis. The Chief Operating Officer shall develop, implement, and maintain storage area procedures that ensure the following processes:

- All cannabis in the process of cultivation, production, preparation, transport, or analysis must be housed and stored in such a manner as to prevent diversion, theft, or loss.
- Any cannabis items such items must be accessible only to the minimum number of specifically authorized employees essential for efficient operations.

- Access to cannabis products must be restricted by the Chief Operating Officer. Only necessary personnel must receive access rights to areas housing security equipment, cannabis, cannabis products or cash.
- All cannabis and cannabis products must be returned to a secure, locked area at the end of any process (i.e. trimming, manufacturing, etc.) or and at the end of the day (i.e. dispensary products on display).
- All cannabis and cannabis products must be stored separately with suitable identification the labels and other labeling materials for each type of cannabis or cannabis product, and the different strength, dosage form or quantity of contents.

Product Storage Areas Security

All employees must ensure that safes, vaults, and any other equipment or areas used for the production, cultivation, harvesting, processing, or storage of cannabis and cannabis products are securely locked and protected from entry at all times, except for the actual time required to remove or replace cannabis. [redacted]

Environmental Control Required

The Chief Operating Officer in coordination with the quality control unit and unit managers must ensure that storage areas holding cannabis and cannabis products are maintained to be dry, well ventilated, and have sufficient insulation or other temperature-control features to avoid extreme temperature fluctuations.

- The company shall incorporate a humidifier or de-humidifier if needed to ensure product quality.
- Storage areas must utilize and maintain carbon filtration or other means of odor control as necessary.

High Contamination Risk Storage and Transportation

Products that can support the rapid growth of undesirable microorganisms as determined by the unit manager or quality control unit must be held in a manner that prevents the growth of these microorganisms.

- Storage and transportation of finished products must be under conditions that will protect them against physical, chemical, and microbial contamination as well as against deterioration of them or their container.
- The unit manager and transportation manager in coordination with the quality control unit must ensure that all high risk products are safely stored and transported.

PRODUCTION AND PROCESSING STORAGE

Production Storage

The Chief Operating Officer is responsible for the oversight of product storage in all units. The Inventory Manager must ensure the separate or defined areas or other comparable control systems are utilized to ensure the prevention of contamination or miscalculation or misuse of any component in any step of the production process including cultivation, manufacture, processing, packaging, labeling, storage or distribution of cannabis or cannabis products. These control areas must be established for:

- Receipt, identification, storage and withholding from use of components, product containers, closures and labels, pending the appropriate sampling, testing or examination by the quality control unit before release for manufacturing, processing or packaging;
- Holding rejected components, product containers, closures and labels before disposition;
- Storage of released components, product containers, closures and labels;
- Storage of in-process materials;
- Processing operations;
- Packaging and labeling operations;
- Quarantine storage before the release of cannabis or cannabis products; and
- Storage of cannabis or cannabis products after release.

Cultivation Processing

Cannabis plants may be stored in four locations during processing. Plants undergoing batch processing must be labeled at all times throughout the process. These areas must be secured and be equipped with full coverage video surveillance. Separate limited access areas for processing include:

- Holding area – plants may be placed in the secure holding area prior to beginning trimming operations. The holding area may only be accessed by the Chief Operating Officer, Inventory Manager, Cultivation Manager, and Processing Manager.
- Trimming area – cannabis may be held in the trimming area while undergoing the trimming process. The trimming area may only be accessed by the Chief Operating Officer, Cultivation Manager, Inventory Manager, and employees performing trimming operations.
- Curing area – cannabis may be held in the curing area until packaged for transport. Cannabis must be stored in batches, labeled, and recorded in the inventory management system by the Inventory Manager. Inventory counts by the cultivation manager shall record changes in weight throughout the processing process.
- Vault storage – cannabis may be prepackaged and held in vault storage for transfer to the dispensary, the manufacturing department, or another cannabis business.

In-Process Storage

If a production process cannot be completed by the end of a working day, the employee responsible for closing the facility must ensure the processing area, or containers containing cannabis are locked inside an area or building with adequate security approved by the Director of Security.

MONITORING AND RECORDKEEPING

The Cultivation Director will monitor the daily operations of the cultivation facility. Any practice or procedure that results in non-compliance, inefficiencies, or sub-standard medical cannabis products will be revised and the necessary retraining scheduled. The Chief Operating Officer will approve recommended procedural changes. Cultivation records will at a minimum:

- Fully disclose all activities and transactions of the cultivation operation in sufficient detail as to be readily understood and audited;
- Be maintained for no less than five years;
- Be sufficient to demonstrate compliance with applicable regulations; and
- Be made available for inspection and copying during normal business hours by authorized representatives of the business, law enforcement, and the OCU.

Inventory records will include the quantity of cannabis at the cultivation facility including the number of plants being cultivated on a daily basis as outlined in the company's inventory policies and procedures. Disposal records will include the disposal method used for any cannabis that was cultivated or acquired but not sold, including evidence of the disposal of the cannabis in accordance with waste disposal policies and procedures. The Cultivation Director will assign data entry tasks to qualified and trained employees. Paper logs maintained by cultivation employees will be retained for sixty months. Required cultivation documentation may be recorded in BioTrackTHC, intranet log, or paper logs as determined by the Cultivation Director and includes:

- Field history, previous land use records, and previous facility use records. Document the date, location, and identity of all materials applied to the land or in the facility for each cultivation facility during the past sixty months in order to establish the date of the last application of prohibited materials. Include all fertilizer and pest-management materials applied.
- Activity logs. All cultivation activities will be recorded in the inventory management system or log maintained in the cloud record system. Activities that will be recorded include, but are not limited to:
    1. Planting/propagation;
    2. Material applications including formulas and quantities and notation if manure is applied;
    3. Pruning;
    4. Pest monitoring and actions taken;
    5. Harvest records and yields;
    6. Crop destruction;
    7. Procedure variances;
    8. Storage and transfer records; and
    9. Any unusual activities.
- Compost production records. For in-house composting, record the required information in the crop management system, including materials and quantities added, the estimated C/N ratio of the mixture, date and temperature, and the employee name each time the compost is turned.
- Propagation material logs. The identity and source of all propagation material, with sufficient specificity to ensure that the material conforms to all established standards and can be traced to its source. Make such records whether material is obtained from an off-site source or produced on-site.
- Seed/planting stock records. Document any seed, cuttings, or planting stock used and document its origin. Record any seed treatments, coatings, or inoculants used.
- Fertilizer logs. All fertilizers used on each agricultural crop and, if applicable, steps taken to monitor manure- or compost-based fertilizers for undesirable microbial pathogens and to monitor water quality from sites where composts are produced or stored.

- Water source logs. Information about water sources and equipment used in irrigation systems, as well as records of all tests performed to monitor water supplies used in irrigation and any records that establish conformity to applicable irrigation regulations.
- Crop maintenance logs. Steps taken to protect and maintain crops, including, at a minimum, a record of all pesticides, herbicides, insecticides, or fungicides used on each crop.
- Harvest records. The harvest records of each crop will be recorded in the inventory management system including the harvest date, crop identification, strain name, initial yield, final yield, storage location, and batch identification.
- Processing logs. Processing records consisting of, at a minimum, the quantity of the harvest; dates of planting and of harvest; processing details, a precise description of the agricultural site; the life-stage of the crop at the time of harvest; and other relevant crop conditions throughout its cultivation.
- Crop disposition records. Record all crops removed from cultivation and processed as waste as outlined in the inventory and waste SOPs.
- Transfer records. Any transfer of crops from a production or storage location will be recorded in the inventory management system including date of transfer, responsible employee, second employee verification, batch identification, quantity, and receiving location in accordance with the inventory and waste SOPs.
- Equipment maintenance records. Record the date, equipment description, materials used, description of the cleaning or maintenance performed, and the responsible employee in the crop management system.

EMPLOYEE SCREENING AND MONITORING

It is critical for the security of the company that only the most qualified, credible, and talented people are hired to help avoid workplace theft, fraud, or violence. It's equally important for the company to conduct background screening on the contingent workers, including cleaning crews, facilities maintenance workers, auditors, and other contractors who have access to the company's property or represent the company. Knowing the background of these workers is required to protect the integrity of the company, as well as the safety of patients. Therefore, this workforce needs to be screened with the same due diligence as any other employee.

To help attract, hire, land, and retain the best employees the company has developed employment screening and monitoring processes to create a candidate experience that benefits potential employees and reduce company risk by utilizing a fast, scalable, and compliant background screening solution.

PRE-SCREENING POTENTIAL CANDIDATES

The Human Resources Manager will pre-screen candidates by stating clearly to potential applicants what items and prerequisites will be needed to properly qualify the employment application. This will streamline the company's application process by having applicants review the information and then determine whether or not they meet the qualifications. This is part of the proactive pre-screening process that ensures applicants who submit their information will pre-qualify based on the specific information needed later in the process.

Chestnut Hill Tree Farm will integrate instant and automated employment screening products into the hiring process.

- Instant searches will be used to efficiently move forward in the hiring process by quickly confirming or validating basic information such as a Social Security number or name and address history.
- Automated searches will provide electronic delivery of process updates and results, eliminating time delays often associated with manual follow-up on important screening components such as employment or education verifications.

COMPLIANCE

The Human Resources Manager will ensure compliance with local, state and federal laws regarding the hiring and employment screening processes. The most prominent legislation the company must abide by is the Fair Credit Reporting Act ("FCRA"). The company will consult legal counsel regarding local state and federal laws, and related employment law matters.

REDUCING RISK

An efficient, thorough employment screening process can, above all else, help reduce the company's overall workplace risk. Identifying risk early, prior to hiring an employee, protects the organization from risk related to:

- Physical Safety
- Financial Security
- Organizational Image or Reputation
- Legal Compliance

EMPLOYMENT SCREENING PROCESS

Criminal History

The company will screen candidates for criminal records to promote a safe, secure workplace by reducing employment-related risk linked to a criminal history. The following searches may be performed depending upon the type of position the candidate is seeking.

- Member-Contributory Theft Information Database – the company will use a member based program where companies share employee theft and shoplifting information to identify applicants with a history of internal theft. The database is built from member contributions and available exclusively to member organizations. Member contributions are typically proprietary records and not found through traditional public record sources.
- National Criminal File Search – Some vendors can offer access to a nationwide database of criminal records gathered from across all 50 states. A variety of sources are utilized including Sex Offender Registries, state and county criminal courts and state-level departments of corrections. This search can provide instant results depending on the provider.
- Felony and Misdemeanor Search – This county courthouse search includes a search of all felonies and misdemeanors on all indexes available at the main county seat court location.
- Motor Vehicle Report – A Motor Vehicle Report ("MVR") reveals the status of an applicant's driver's license and any violation history. This search should be conducted on all candidates who will have driving responsibility for a company, including those who will not only drive a company vehicle but will also drive a personal vehicle on company time or for company purposes.

Verification and Qualification

The Human Resources Manager will utilize the following solutions depending on the level of security required for the position.

- Social Security Number Verification ("SSNV") – This search matches the input information against millions of consumer header credit files contained in the databases of nationwide credit reporting agencies. The SSNV returns other names and addresses associated with the identifying information used to request the report.
- Credit Check – This search matches the candidate's information to information held by the Credit Bureaus, and returns the candidate's credit report.
- Employment Verification and/or Education Verification – These two products are used to verify the information provided by the candidate.
- Employment Eligibility – An employment eligibility verification service will be used to streamline the Form I-9 process. The company will participate in the E-Verify program to confirm every new hire's employment eligibility by sending the information used to complete the I-9 through the Social Security Administration ("SSA") and Department of Homeland Security ("DHS") databases.

Occupational and Biometric Services

Chestnut Hill Tree Farm will utilize a drug testing service provider who will track results, provide reports, and ensure the company stays in compliance with the law. The service provider will:

- Assist the company in developing or updating drug testing policies
- Coordinate and store your Driver Qualification Verification files
- Meet your immunization and medical exam requirements including receiving the exam results

A basic DOT Five Panel Drug Test (urine conventional) will be used. The following drugs will be tested from the applicant's urine sample:

- Amphetamines (Amphetamine, and Methamphetamine)
- Benzoylecgonine (Cocaine Metabolite)
- Cannabinoids (Marijuana Metabolite, and THC-COOH)
- Opiates (Codeine, and Morphine)

- Phencyclidine (“PCP”)

Adjudication and Alerts

Chestnut Hill Tree Farm will provide a criminal records adjudication policy as part of the screening process. FCRA-mandated Adverse Action letters for candidates that fail to meet specific screening criteria set forth by the organization will be delivered to candidates.

MONITORING EMPLOYEES

A monthly compliance exception report is completed for the employment screening process. The report informs the Human Resources Manager which candidates have completed various parts of the screening process and which have not. The report also updates the company to which components are missing from a candidate’s employment screening process.

The Human Resources Manager will cause all required criminal and drug screens to be updated every two years. Employees are required to notify the company whenever they have any type of encounter with law enforcement. The Human Resources Manager will determine if a Level 2 background screening should be performed upon the employee’s notice.

A post-accident drug screening may be performed at the Human Resources Manager’s discretion or if required for worker’s compensation purposes.

Video monitoring of employees occurs in the normal course of operations. Additional footage may be reviewed if any employee is suspected of theft or diversion. The company will notify law enforcement of any employee determined to have stolen any medical cannabis whether plant or product form. Employee performance is monitored by their immediate supervisor and documented in accordance with the company’s staffing policies.

BIOTRACKTHC MONITORING

The system prevents unauthorized system access or actions via user PIN, fingerprint scan, or username and password. Every system action records not only the effect of the action, but a timestamp and the identity of the system user performing the action, providing a full auditable trail that is retrievable at any time, and may be produced in BioTrackTHC’s reporting tool (e.g., Forensics Report). These accountability features enable a user to identify the reasons behind any discrepancies, should any unexplainable material losses occur.

BIOTRACKTHC

BioTrackTHC has a biometric chain of custody module that logs every action in real time and the user who performed that action. BioTrackTHC has the ability to integrate with scales to deter employee theft and human error. Every action is time stamped which can be cross referenced with security cameras. All of these functions prevent diversion, abuse, and illegal or unauthorized conduct relating to medical cannabis.

PERSONNEL

In addition to the specialized cannabis tracking system, BioTrackTHC, the company has a large pool of expertise available related to supply chain integrity and tracking mechanisms. These experts include:

BRADY BLAKE - CONSULTANT

As a quality control manager at Colorado Alternative Medicine, Blake gained extensive experience implementing and operating Colorado's State mandated tracking software system, Marijuana Inventory Tracking System, which efficiently tracks each crop from seed-to-sale. He believes his experience using the company's prior point-of-sale inventory software program, MMJ Freeway, provided a smooth transition to the use of a more advanced and efficient technology base. In 2013, Blake was promoted to a senior management position. He became responsible for the care and tracking of over 4,000 plants and approximately twenty new employees in a grow facility housing 240,000 watts of flower production.

CODI COLEMAN – CULTIVATION DIRECTOR

As a leader in quality assurance and cannabis production, Coleman begins his cultivation process by tracking and labeling each product from the moment the crop is propagated. He applies a seed-to-sale system to keep track of each plant he harvests. His methods involve full compliance to all laws and regulations.

JILL LAMOUREUX - ADVISOR

Jill Lamoureux has been a cannabis industry frontrunner in the State of Colorado since 2008, when she and her husband created one of the Colorado's most respected multi-location dispensing operations. Their branches of business consisted of four retail stores, three cultivation operations, and one cannabis kitchen. As a former dispensary and cultivation owner and operator, she brings first-hand experience with tracking all cannabis plants grown in a particular harvest. In 2010, Lamoureux worked with the State of Colorado's Medical Marijuana Enforcement Division (MMED) to develop the first statewide medical cannabis regulations regarding tracking, transparency reporting, and compliance. These regulations required every cannabis-producing plant to be tracked by the MMED through each stage of its life, from cultivation to point of sale. Since 2013, Lamoureux has served as a subject matter expert consulting to the BOTEC Analysis Corporation in cannabis regulation and policy. Recently, she provided aid to the BOTEC team advising Washing State on rule-making issues for recreational cannabis operation, including regulations concerning tracking cannabis crops from seed

Part 3.A.4.j. Personnel reserved solely for inventory control purposes

The Inventory Manager will report directly to the Chief Operating Officer. The role oversees all inventory operations in the company. The Inventory Manager role will be filled by R. Dunstan Wallace II. Wallace shall assist the company in all inventory control processes. Wallace holds a Bachelor's Degree from the University of Florida where he graduated in accounting. He began working with Chestnut Hill Tree Farm in 2011, building complete websites for consumer retail and marketing. Additionally, he has extensive experience developing Quick Books accounting software for companies, and currently serves as a staff accountant at the University of Florida.

The Inventory Manager will work closely with the Chief Financial Officer to ensure that all inventory policies and procedures are sufficient to provide a true and accurate accounting of all cannabis plants, materials, and finish product at all times.

Part 3.A.4.k. Personnel reserved solely for security purposes

John Powell will serve as the company's Security Director. Powell is an experienced law enforcement and public safety professional with a solid academic foundation who has progressively served at all levels with increasing responsibility and accountability gaining real life experience and professional training. This experience enables effective operations in planning, asset allocation, diversity/gender awareness, personnel management and negotiations, strategic planning, tactical response, organizing, recruiting, budgeting, succession planning and relationship building. As a former Maricopa County Protective Services Department Director and Director of Florida's Division of Alcoholic Beverages and Tobacco department, Powell brings a strong base of anti-diversion, loss prevention, and asset protection knowledge to the Dispensing Organization. His wide-ranging experience in local, federal government, school, and information technology security will be invaluable to the company and its stakeholders.

WASTE DISPOSAL PROCEDURES

SOURCES

Chestnut Hill Tree Farm has a comprehensive system for systematically collecting and properly destroying all materials containing cannabis. The final material disposal will render both finished product and precursor materials completely unrecoverable beyond reclamation. Routine disposal procedures will include company employees to securely transport all materials designated for destruction to the cultivation facility for compost or medical waste disposal. Controlled waste materials for destruction may originate from several sources:

- Cannabis stems or other unusable plant materials generated at the manufacturing site are weighed, labeled and stored in a limited access area until they can be properly destroyed.
- All cannabinoid containing extracts, concentrates, in-process materials and bulk product that cannot be further processed into approvable packaged product are labeled and held under quarantine in a secure storage area until they can be properly destroyed.
- Packaged product determined to not meet the minimum safety standards and specifications for brand consistency or otherwise rejected by Quality Assurance are held under quarantine in a secure storage area separate from any released products until they can be properly destroyed.
- Packaged medical cannabis products at a dispensing facility that become damaged, short dated or were returned by a customer are securely stored at the dispensing facility until they can be properly transported to the manufacturing site and securely stored until they can be properly destroyed.
- Any products that were subjected to improper storage conditions including but not limited to extremes in temperature, water damage or smoke due to natural disasters, fires or equipment failures are held under quarantine and securely stored until they can be properly destroyed.

STORAGE & TRANSPORT

All medical cannabis materials and finished products will be held under secured quarantine and securely stored until they can be properly destroyed. All of the above cannabis materials and cannabinoid containing products will be transported in a locked and secure storage compartment via a transporting vehicle. All shipments of material designated for destruction shall travel from the manufacturing facility directly to an approved medical waste disposal facility. All transport vehicles will be staffed or accompanied by a minimum of two company employees and at least one company transport team member shall remain with the vehicle at all times until these material are received and quarantined at the designated site.

Chestnut Hill Tree Farm will utilize the services of an environmental waste hauler for laboratory waste, a medical waste hauler for finished products disposal, and will compost cannabis plant materials on-site. The Facilities Manager is responsible for the company's hazardous and controlled substance waste policies and procedures.

FEDERAL, STATE, AND LOCAL REQUIREMENTS

The Facilities Manager will manage the company's waste management program and will ensure compliance with:

- US EPA regulations (40 CFR 260-273)
- Florida Department of Environmental Protection regulations
- Alachua County Regulations
- DEA Disposal of Controlled Substances regulations
- All other applicable regulations

WASTE DISPOSAL LOG

All waste disposed of must be recorded in the waste disposal log including:

- The date of disposal;
- The type and quantity disposed of;
- The manner of disposal; and
- The name of the employee, patient, or caregiver who supplied the waste if applicable.

LIQUID WASTE REQUIREMENTS

Liquid waste containing nutrient residues, cannabis, or by-products of cannabis processing shall be disposed of in compliance with requirements for discharge into surface water, groundwater, and sewers, or disposed of in an industrial wastewater holding tank.

UNAUTHORIZED DESTRUCTION OF CANNABIS

The Chief Executive Officer will report any verifiable incident of unauthorized destruction of cannabis to law enforcement as needed. All company employees must report the unauthorized destruction of cannabis to the appropriate supervisor immediately. Unauthorized disposal of cannabis may be cause for termination.

BIOTRACKTHC

BioTrackTHC's inventory management tools track unusable cannabis (e.g., outdated, damaged, deteriorated, mislabeled, or contaminated) and cannabis waste by weight and barcode throughout every phase of cannabis production as well as returns and recalls in the retail phase. Upon destruction, the system can generate a destruction report. The system also allows for the electronic authentication of the witnesses to the destruction through either a four-digit pin number or a biometric scan. To clarify, BioTrackTHC does not simply delete the data related to the waste; rather, the system evidences the lifecycle of every original plant barcode with an auditable trail to either retail sale or verified destruction.

BIOTRACKTHC

Chestnut Hill Tree Farm has selected BioTrackTHC as the provider of its seed to sale tracking systems. BioTrackTHC provides effective cutting-edge technology solutions for the emerging legal cannabis industry that (1) prevents product theft; (2) assists business owners with running their cultivating, packaging, and retail operations more profitably and to better comply with the law; (3) all without leaving sensitive business and consumer data vulnerable in the cloud. Specifically, BioTrackTHC is the industry's only true seed to sale software system with enterprise resource planning, complete inventory tracking, point of sale, marketing, financial reporting and regulatory compliance features. Because it is a server based system with advanced security features, no one, not even the BioTrackTHC team can access business or consumer information without permission from the system administrator.

BioTrackTHC was formed in 2007 with the goal of developing software solutions that advance public safety in the medical industry by preventing prescription drug fraud and drug diversion. To that end, BioTrackTHC created biometric based technologies that provide transparent patient access to treatment and medication. The development of biometric medical software technologies led to securing two U.S. technology patents (US 8,086,720 & US 8,335,697) and a Canadian patent (CA 2,715,969). Further BioTrackTHC software has undergone the rigorous SAS 70 internal controls technology audit. Our hands on experience in the industry have led to our consulting and developing systems for the Drug Enforcement Agency ("DEA") and the High Intensity Drug Trafficking Area ("HIDTA") Program.

Most recently, BioTrackTHC ™ was contracted by the State of Washington for the first legal cannabis state monitoring and inventory tracking system in the United States. Development and implementation for the State of Washington traceability system was completed ahead of schedule. From our experience and understanding of governmental regulations, in 2010 we went on to shift our focus and create and develop the premier commercial seed-to-sale tracking software solution tailored specifically to meet the unique needs of a government regulated industry BioTrackTHC was developed specifically for cannabis tracking and is the only seed-to-sale software vetted by a government agency. BioTrackTHC is both robust, secure, and feature rich enough to be the complete solution for cultivators, processors, and retailers in over 1,100 locations in 18 states, the District of Columbia, and Canada. For over four years, the company has expanded it's footing in the industry by continuing to support governmental agencies by adapting and providing software enhancements that guarantee state specific compliance of BioTrackTHC clients. Our software allows users to easily remain transparent and accountable by maintaining accurate real-time data and sound reporting through an unbreakable audit chain that can easily track the full lifecycle of legal cannabis from production, testing, transportation, destruction, and sale. To date over 400 million grams of cannabis have been traced from seed-to-sale through BioTrackTHC applications.

BioTrackTHC has formed a Collaborative Clinical Development Alliance to help facilitate an easy web patient interface for collecting actionable follow up data related to the ever-evolving cannabis industry. BioTrackTHC has created iKush.com, the first real-time direct to patient web portal for easily locating cannabis dispensing facilities with accurate inventory levels. After a patient is associated and validated by the respective dispensing facility, iKush allows the patient a simplified way to research and pre-order medical cannabis.

Patients will be associated with a specific dispensary and must be authorized by the dispensary in order to participate. Each patient will have their own iKush dashboard upon logging into the website. The dashboard will display patient history with easy to use patient information collection forms. These collection forms will create the foundation for unheralded insight into the use and outcomes associated with medicinal cannabis. The required data collection points will produce actionable intelligence creating a real time patient management platform for the

cannabis industry and will facilitate data collection and analysis by research institutions in the state of Florida. BioTrackTHC is fully HIPAA compliant and has undergone strict SAS 70 DEA certification.

The BioTrackTHC Inventory Management System offers users with a unique solution that tracks every level of the growth process from cultivation to distribution. Every plant, seed or clone is assigned a unique non-repeatable 16 digit barcode number. Once the flower is batched after being harvested, each batch is given a new barcode while still being associated with the original source barcode. Every batch of product is separated in the inventory control module by the individual barcode for complete accountability and recall protocol. BioTrackTHC technology allows the producer to monitor differentiations in the growth process by entering production notes or information that doesn't have pre-defined fields within the software. The real-time feature tracks any data changes made to the system, the person responsible for making the changes and the time it was made.

Waste

Location	Room	Inventory type	User	Date	Quantity
"Grow"House	Drying Room	Stems	gwalorski	06/11/2014 02:18 PM	500.00
"Grow"House	Flowering	Trim	gwalorski	06/11/2014 02:19 PM	250.00
"Grow"House	Drying Room	Stems	gwalorski	06/13/2014 12:01 PM	400.00
"Grow"House	Flowering	Vegetation Trim	gwalorski	06/13/2014 12:02 PM	1000.00
"Grow"House	Drying Room	Sugar Leaf	gwalorski	06/13/2014 01:28 PM	400.00
"Grow"House	Drying Room	Stems	gwalorski	06/13/2014 01:29 PM	400.00
"Grow"House	Flowering	Trim	gwalorski	06/13/2014 01:30 PM	1000.00
"Grow"House	Drying Room	Sugar Leaf	gwalorski	06/19/2014 02:52 PM	700.00
"Grow"House	Drying Room	Stems	gwalorski	06/19/2014 02:54 PM	700.00
"Grow"House	Flowering	Trim	gwalorski	06/19/2014 02:55 PM	400.00

Notes **Strain Notes** **Additives**

Individual Note Group Note

Date	Phase	User	Subject
08/05/2014	Flowering	gwalorski	watered the room
08/28/2014	Flowering	gwalorski	Watered the room

Watered the room

New Save

Every step of the supply chain is tracked with real-time solutions. The inventory conversion features are fully tracked and documented by the Inventory Forensics Report, dispensed logs and Sales Reports. Once the product is selected for distribution, it is priced and sold to a patient using the customer point-of-sale screen within the system. BioTrackTHC enables the business to collect, store, and retrieve all data and activity. All inventory records, patient records, recall reports, sales/transaction records, product disposal records, and all scanned documents can be accessed at any time (real time), either in-system or through the report creation tool. Though system actions can be adjusted or voided, at no time is any data ever fully deleted as BioTrackTHC maintains a log of every action, including adjustments and voids, so that the entire history of the system may be reconstructed. The availability and report ability of the system data enables the said entity to produce any information necessary for an inspection.

BioTrackTHC can adjust inventory and always requires a reason for removal when utilizing the inventory adjustment feature. Product in need of quarantine can be separated from bulk and placed in the designated area. Inventory

destruction can be initiated through the system requiring documentation of destruction purpose and/or approved method as well as the employee performing the action. Although the inventory can be adjusted or voided, at no time is any data ever fully deleted as BioTrackTHC maintains a log of every action, including adjustments and voids, so that the entire history of the system may be reconstructed. The system data enables the company to produce any information necessary for the OCU during an inspection or at their request.

PERSONNEL

In addition to the specialized cannabis tracking system, BioTrackTHC, the company has a large pool of expertise available for tracking purposes. These experts include:

BRADY BLAKE - CONSULTANT

As a quality control manager at Colorado Alternative Medicine, Blake gained extensive experience implementing and operating Colorado's State mandated tracking software system, Marijuana Inventory Tracking System, which efficiently tracks each crop from seed-to-sale. He believes his experience using the company's prior point-of-sale inventory software program, MMJ Freeway, provided a smooth transition to the use of a more advanced and efficient technology base. In 2013, Blake was promoted to a senior management position. He became responsible for the care and tracking of over 4,000 plants and approximately twenty new employees in a grow facility housing 240,000 watts of flower production.

CODI COLEMAN – CULTIVATION DIRECTOR

As a leader in quality assurance and cannabis production, Coleman begins his cultivation process by tracking and labeling each product from the moment the crop is propagated. He applies a seed-to-sale system to keep track of each plant he harvests. His methods involve full compliance to all laws and regulations.

JILL LAMOUREUX - ADVISOR

Jill Lamoureux has been a cannabis industry frontrunner in the State of Colorado since 2008, when she and her husband created one of the Colorado's most respected multi-location dispensing operations. Their branches of business consisted of four retail stores, three cultivation operations, and one cannabis kitchen. As a former dispensary and cultivation owner and operator, she brings first-hand experience with tracking all cannabis plants grown in a particular harvest. In 2010, Lamoureux worked with the State of Colorado's Medical Marijuana Enforcement Division ("MMED") to develop the first statewide medical cannabis regulations regarding tracking, transparency reporting, and compliance. These regulations required every cannabis-producing plant to be tracked by the MMED through each stage of its life, from cultivation to point of sale. Since 2013, Lamoureux has served as a subject matter expert consulting to the BOTEC Analysis Corporation in cannabis regulation and policy. Recently, she provided aid to the BOTEC team advising Washing State on rule-making issues for recreational cannabis operation, including regulations concerning tracking cannabis crops from seed

PART 3.B. PROCESSING

Chestnut Hill Tree Farm, LLC is committed to successfully implementing a development plan that will transform the company from a start-up manufacturer of standard, yet unproven, cannabis therapeutic products to a leader in innovative and validated pharmaceutical delivery systems. The company will be guided by Dr. Susan Baumgartner as it leverages established partnerships with industry leaders in pharmaceutical formulation development, drug delivery systems, and manufacturing to develop true medical products that optimize delivery of active compounds derived from medical cannabis. A controlled-release formulation of cannabis oil delivered in a capsule-based dosage form will be the first validated cannabis product scheduled for development by Chestnut Hill Tree Farm's medical cannabis research and development division, Novia Medical. Dr. Baumgartner's experiences in the medical pharmaceutical field provide the company with expert knowledge of drug development, clinical trials, and observational studies of pharmaceutical products. She also brings a deep knowledge of production processes with respect to pharmaceutical manufacturing. Her knowledge base, leadership and training skills, and strong project management background combined with the company's roster of talented advisors positions Chestnut Hill Tree Farm perfectly to take advantage of the intersection of relaxing federal limitations on research and broader access to research dollars than ever before.

1. TECHNICAL ABILITY

Part 3.B.1.a. Experience with good manufacturing practices

Strict cultivation protocols throughout the entire life cycle of the cannabis plant will provide the manufacturing unit with input cannabis materials that are safe and as consistent as possible given plant variability. Healthy and vibrant plants yield higher quality products. The cultivation team will utilize functional and stable plant genetics to manufacture the most effective plant-based medicine achievable under Florida's medical cannabis framework. The manufacturing team will transform finished raw cannabis into consistent, effective, and pure pharmaceutical-grade solutions.

The company will consistently adhere to good Current Good Manufacturing Practice (cGMP) to ensure pure and safe cannabis products. The company will use the opportunity afforded by its analytical laboratory and will invest time and resources into breeding genetics that consistently provide high yields of cannabinoid content for extraction and formulation. These long-term research and development efforts will eventually lead to leaner manufacturing processes resulting in more affordable medicine.

SUSAN BAUMGARTNER, PHARM.D, MBA – CHIEF OPERATING OFFICER

Dr. Baumgartner has extensive knowledge of good manufacturing practices related to clinical trial supplies and manufacturing of pharmaceutical products through her professional training as a pharmacist and experience working in a pharmaceutical company and a companion medical device company that partnered with pharmaceutical companies. Dr. Baumgartner has experience in providing oversight to vendors that supplied CGMP products for ingestion by humans and ensuring regulatory compliance related to the use and manufacturing of ingestible medication adherence markers. Her past experiences in the pharmaceutical field provide the company with expert knowledge of drug development, clinical trials, and observational studies involving pharmaceutical products. She also brings a deep knowledge of production processes with respect to pharmaceutical manufacturing. She initiated and managed the relationships with industry-leading formulation development and contract manufacturing organizations to produce high-quality products for human consumption and integration into pharmaceutical products. Dr. Baumgartner's proficiency will aid the company in providing the safest and most effective products and delivery systems for its patients, including efficient formulation of the therapeutic cannabinoid, CBD, and formulation and manufacture of a controlled-release capsule.

BRADY BLAKE - CONSULTANT

Brady Blake has experience with good manufacturing practices due to his six years in the horticulture industry in Colorado. Blake began directing company practices at Colorado Alternative Medicine in 2010, a highly recognized medical cannabis center known for their industry leading focus on having quality product for their patients. Blake began working in the product-processing department, and was promoted multiple times. Currently, he holds the title of facility manager, directing all cultivation operations. This position requires the oversight of operational procedures and protocols, inventory control, and packaging and labeling departments. Blake commonly managed fifteen employees, ensuring each company staff member utilized good manufacturing practices.

Blake's pervasive knowledge regarding the cultivation of cannabis and the crop's medicinal properties causes him to be a valuable asset to the company's business model and future patients. He has personally worked with and cultivated over one hundred strains of cannabis for human consumption, and has a deep understanding of each strain's particular medicinal benefits and relief of ailments. His continual research in the production process of cannabis has provided the benefit of witnessing the powerful healing cannabis provides to individuals. Blake's past experience with soft skills training, combined with his naturally compassionate attitude, help him articulate the effects of medicinal cannabis to current and future patients. Blake is driven to educate the public on the medicinal therapies cannabis provides and produce high-grade, quality medicine.

CODI COLEMAN – CULTIVATION DIRECTOR

During his six years in the cannabis industry, Codi Coleman has taken advantage of opportunities that have enabled him to become proficient in quality control, consulting, and organic medicinal cannabis production. While managing multiple cannabis cultivation operations, Coleman became accountable for ensuring consistent, quality product each harvest. Coleman is highly knowledgeable in many types of nutrient additives and successful methodology applications in compliance to good manufacturing practices. These developed and implemented protocols have resulted in dependably healthy, successful yields. Additionally, Coleman has experience incorporating good manufacturing practices into every cultivation department. During the time when the cannabis industry lacked best practices and good manufacturing procedures, Coleman had the rare opportunity to lead and manage a large cultivation operation while incorporating best practices and compliance into all business practices.

JILL LAMOUREUX - ADVISOR

Chestnut Hill Tree Farm engaged the assistance of Jill Lamoureux to explore operating options and select an operating model that works best for the company. Lamoureux brings over eight years of commercial cultivation experience to the operating plan's development. She previously owned and operated some of the nation's first licensed cannabis facilities in Colorado. Her cultivation operations covered 50,000 sq. ft. in three locations and consistently provided pesticide free cannabis medicine for thousands of patients.

Jill Lamoureux has worked with the American Herbal Products Association and nutraceutical experts to develop standard good manufacturing practices for the cannabis industry, providing aid in the creation of regulatory health and safety standards. In addition, her experience regarding the development of the Patient Focus Certification audit standards have made her a national expert on good manufacturing practices applied to cannabis operations. The company will benefit from her accumulation of this knowledge base and will implement many of these practices into the operation.

Based on her experience cultivating plants for condition specific cannabis medicines, Lamoureux developed one of the most robust quality control programs in the country. When properly implemented, these protocols ensure safe

and purity cannabis medicine products for patients. These protocols will be implemented by the company and supervised by the Quality Assurance Officer.

JAHAN MARCU, PHD - ADVISOR

Dr. Jahan Marcu shall assist the company in both quality assurance and scientific analytics. Jahan Marcu, Ph.D., is a cannabinoid research scientist, with expansive experience in quality assurance and groundbreaking research in the plant science and medicinal cannabinoid field. Dr. Marcu brings strategic focus, vision, and mature judgment gained during a successful career guiding the creation of operational protocols while implementing scientific research and advisory services that generate sustained, consistent, positive results to the cannabis industry. He uses innovation and research to educate the world, devise medications and develop fundamental business practices that change patient's way of life for the better. Dr. Marcu is currently the Director of Research and Development at Green Standard Diagnostics Inc., the Senior Scientist at Americans for Safe Access, and on the Board of Directors of the International Association for Cannabinoids as Medicine. Jahan Marcu is also a founder of the Patient Focused Certification program. He received his Ph.D. for significant contributions to the study of the structure and function of the CB1 receptor, and the role of the endocannabinoid system in bone.

A court qualified cannabis and synthetic cannabinoid expert; Dr. Marcu efficiently provides growth-stage companies with outsourced leadership through effectively translating complex scientific concepts to business operations for consistent, optimal results, pursuant to a company's mission and regulations. His understanding of convoluted scientific strategies, principles, and practices enables him to analyze and develop strategic business plans and Good Manufacturing Practices that provide the highest quality products for patient consumption. Marcu contributes to the conceptualization and implementation of tactics that allow for overall corporate health and growth in the cannabis field.

SHANNON WILSON – ADVISOR

Shannon Wilson is the owner and founder of Colorado-based Mahatma Concentrates. The award winning company's core belief is simple, to produce only the best, high quality cannabis extractions. This philosophy has resulted in Mahatma Concentrates being recognized through numerous industry awards.

- First place in best concentrates in the 2013 High Times Cannabis Cup;
- Second place in best cannabis concentrates in the 2013 710 Cup;
- First place in the best overall champion at the Daba-Doo Invitational in Amsterdam in 2013 and;
- Second place in best concentrates at the Hemp Connoisseur Championship in 2014.

Wilson is an active member of the NCIA, CBA, and MIG. In addition, she is a founding member of Women Grow and currently serves as chairman for MIG's Concentrates Committee. Wilson offers valuable insight and expertise to the company, scaling a large manufacturing operation within a regulated environment successfully.

GOOD MANUFACTURING PROCEDURES

In accordance with cGMP, a Standard Operating Procedure (SOP) system will be adopted and enforced to ensure quality systems are in place and continuously improving. The company will operate according to a documented system of SOPs designed to ensure compliance with best practice and all applicable regulations. The SOP system guides employees to:

- Follow procedures as written.
- Understand their responsibilities in implementing the SOPs.
- Provides management guidance to ensure that personnel follow established procedures.
- Identify compliance and procedural issues.

The SOPs provide guidance for several of the major steps in cultivation, manufacturing, packaging, labeling, distribution, dispensing, and quality assurance operations. The company's SOPs will continuously improve with operating experience. Directors will implement new SOPs as needed and perform annual reviews to ensure they remain current with actual operations. All SOPs will be approved by the Quality Assurance Officer prior to implementation. Material modifications or revisions to procedures related to the cultivation, processing, manufacturing, distribution, or dispensing policies will not be implemented without prior written approval of the OCU.

The Quality Assurance Officer is responsible for maintaining all operational SOPs. Current versions will always be available online and in print so employees can easily refer to them. Obsolete procedures will be identified and removed annually. All employees will be trained to the SOPs and be required to document any variance. Each Quality supervisor will review and approve variances and will update the SOP as needed. The Director of Quality Assurance will be responsible for oversight of any procedural variance that results in a change to the SOP.

REGULATORY COMPLIANCE

Manufacturing operations are subject to multiple laws and regulations. The Directors will ensure that all applicable laws and regulations are followed in the manufacturing operations. Oversight of the company's operations is granted to the Florida Department of Health's Office of Compassionate Use by Section 381.986 of the Florida Statutes and Administrative Code ("regulations"). In addition, the company's operations are subject to building, zoning, employment, safety, environmental, manufacturing and agricultural laws, as well as local ordinances. The company's SOPs detail procedures for compliance with applicable laws and regulations. In addition, the is subject to or has voluntarily adopted the following laws and regulations:

- Compassionate Medical Cannabis Act of 2014, Title 29, Section 381.986 of the Florida Statutes.
- Good Manufacturing Practice (Florida Drug and Cosmetic Act), Title 33, Part 1, Chapter 499 of the Florida Statutes.
- Pest Control, Title 32, Chapter 482 of the Florida Statutes.
- 40 CFR 141.63, Maximum contaminant levels (MCLs) for microbiological contaminants.
- OSHA (29 CFR 1928.110), FDA Title 21 CFR 110. See also Florida Department of Business and Professional Regulation rule 61C-3.001 requirements for sanitary facilities.
- Florida Commercial Fertilizer Law, Chapter 576 of the Florida Statutes rules and regulations and the USDA GAP regarding fertilizer usage, storage, and testing.
- Good Manufacturing Practices (GMPs) as set forth in 21 CFR 110.37(a) and 110.80(a)(1).
- Only sanitizing products will be used that meet requirements defined in 21 C.F.R. § 178.1010 and registered by the EPA.
- Food Service Protection, Title 29, Section 381.0072 of the Florida Statutes.
- All other applicable laws including environmental waste and employment laws in the State of Florida.

SUSAN BAUMGARTNER, PHARM.D., MBA – CHIEF OPERATING OFFICER

Dr. Susan Baumgartner shall apply her knowledge and research of plant science and pharmacology to provide the company with strategic direction and oversight of medical product development. Susan Baumgartner is a Doctor of Pharmacy and Master of Business Administration; both degrees were earned with the highest honors. Dr. Baumgartner has extensive experience in accelerating the growth of startup companies. She managed regulatory submissions to the FDA, and served as primary liaison with FDA for clearance of an in vitro diagnostic device and ingestible adherence marker (i.e., food additive) for use in solid oral dosage forms.

Dr. Baumgartner has experience in negotiating collaborative development deals and establishing strategic alliances, including partnerships with pharmaceutical companies and contract development and manufacturing organizations (CDMOs), including Catalent. She has completed HIPAA training and possesses significant experience handling confidential information. Furthermore, Dr. Baumgartner has significant experience designing and implementing successful and compliant training programs for employees, including: managers, individual contributors, and cross-functional teams. Her experience gathering and managing data, including prescription drug utilization data, clinical trial data, and research summaries will assist the company's efforts to provide and evaluate pharmaceutical-grade cannabis products.

Dr. Baumgartner has professional training as a pharmacist and significant knowledge of therapeutic agents for disease management and prevention. Her past experiences in the medical field provide the company with expert knowledge of drug development, clinical trials, and observational studies involving pharmaceutical products. She also brings a deep knowledge of medicinal cannabis with respect to routes of administration. Dr. Baumgartner's proficiency in pharmacology and medication use will aid the company in providing the most effective delivery systems for its patients, including efficient formulations of the therapeutic cannabinoid, CBD, and development of a controlled-release capsule.

Dr. Baumgartner has managed adverse event reporting and recalls related to pharmaceutical products in compliance with FDA reporting requirements. Her experience in quality assurance and compliance will help the company manage product risk and reduce product liability. Dr. Baumgartner's in-depth knowledge with respect to cannabis and routes of administration will ensure effective and successful patient interactions. Her experience designing and implementing successful training programs for employees, including managers, individual contributors, and cross-functional teams will assist the company in educating and managing a skilled and professional workforce.

DEBORAH A. GAW – CHIEF FINANICAL OFFICER

As co-owner of Chestnut Hill Tree Farm for over thirty years, Deborah A. Gaw has been a leader in the introduction and marketing of new fruit and nut varieties for the horticulture market in both the Florida Region and across the US. Gaw received a Bachelor's of Science in horticulture and pre-med from the University of Florida in 1978. She became a biological scientist for the UF Department of Horticulture for seven years, conducting a wide number of research projects in plant physiology and post-harvest physiology. Due to her strong background in chemistry, she managed and directed the Department's plant tissue analysis laboratory for four years, which involved kjeldahl nitrogen analysis and atomic mass spectroscopy. Gaw was responsible for directing all laboratory operations and ensuring each staff member and UF student utilized best practices, from preparing sample tissue and reagents, maintaining a sterile, contaminant-free work environment (acid washing of all lab ware and surfaces), performing analysis and maintaining/calibrating the equipment, ordering/handling gases and all supplies, and summarizing and presenting data.

SAMUEL GLUCKSMAN, DPM - CONSULTANT

Samuel Glucksman, DPM, the crop management specialist and primary account manager at Glades Crop Care, Inc. currently directs all cultivation operations for the East coast and Homestead divisions. With an extensive educational background in horticulture, receiving a B.S. in botany and PhD in plant medicine from the University of Florida, his continuing experience in the agriculture industry has led him to be a skilled expert and frontrunner in the cultivation and research of diverse plants. He has successfully developed detailed protocols for company operations from diligent field research, providing growers with the best possible organic and conventional recommendations to solve pest, disease, and cultural issues (i.e. pesticide application, etc.). He has directed environmental controls and pest management, providing help to individual's growing issues. Additionally, Dr. Glucksman is an expert in good agricultural practices, and heads the human resources, administrative, and customer service departments at Glades Crop Care, Inc.

Dr. Glucksman's established knowledge and long-term involvement in the scientific field enables him to bridge production optimization and research enhancements in plant medicine to the cannabis cultivation industry. Years of progressive experience in the field cause Dr. Glucksman to bring valuable scientific research and advisory services to the company. Dr. Glucksman will be an important asset in the development of the company's fundamental and compliant production practices.

JAHAN MARCU, PHD - ADVISOR

Jahan Marcu and his team of scientists of Green Standard Diagnostics shall assist the company in both quality assurance and scientific analytics. Jahan Marcu, Ph.D., is a cannabinoid research scientist, with expansive experience in quality assurance, laboratory methods, and groundbreaking research in the plant science and medicinal cannabinoid field. Dr. Marcu has extensive experience in cannabis laboratory operations and method development.

Dr.Marcu's understanding and long-term involvement in the scientific field enables him to leverage diverse business optimization and research enhancements to a variety of entrepreneurial, market-making businesses in the cannabis industry. Marcu's years of progressive experience has qualified him to significantly impact profitability and growth objectives for businesses in the cannabis field. Before earning his Ph.D., Dr. Marcu worked at the California Pacific Medical Center Research Institute studying the anti-cancer properties of compounds from the cannabis plant (Published in the Journal of Molecular Cancer Therapeutics) and on analytical cannabis research projects in Holland. Among many of his publications for cannabis research, he is also an author of the American Herbal Pharmacopeia's Cannabis Monograph and is the Chief Auditor for the PFC program. Dr. Marcu was the first recipient of the Billy Martin research award from the International Cannabinoid Research Society. He has also served as a volunteer for ASA since 2003.

A court qualified cannabis and synthetic cannabinoid expert; Dr. Marcu efficiently provides growth-stage companies with outsourced leadership through effectively translating complex scientific concepts to business operations for consistent, optimal results, pursuant to a company's mission and regulations. His understanding of convoluted scientific strategies, principles, and practices enables him to analyze and develop strategic business plans that provide the highest quality products for patient consumption. Marcu contributes to the conceptualization and implementation of tactics that allow for overall corporate health and growth in the cannabis field.

BRADY BLAKE - CONSULTANT

As facility manager at Colorado Alternative Medicine Brady Blake has extensive experience with analytical laboratory methods. During his six years working with the cannabis industry, Blake has directed product-processing departments and created protocols for laboratory operations pursuant to state laws and regulations and company policies.

CODI COLEMAN – CULTIVATION DIRECTOR

Codi Coleman is highly knowledgeable in analytical laboratory methods due to his seasoned career in the cannabis industry in Colorado. An expert in nutrient additives and successful methodology applications, Codi has created successful business models that result in consistently healthy, effective yields. He generally prefers to use only organically derived nutrients and safe agricultural practices. He has applied multiple training techniques to his operational protocols including: topping, super-cropping, trellising, and low stress training. In addition, Coleman has created supplemental lighting climate controls designed to be amended for specific strains of cannabis for the production of offseason crops. Coleman applies tracking and labeling methods to each crop from seed-to-sale. He is passionate about the medicinal healing cannabis provides to his patients, and has developed diligent operational procedures which provide pure, high quality, products.

DEBORAH A. GAW – CHIEF FINANCIAL OFFICER

As a biological scientist for the UF Department of Horticulture for seven years, Deborah Gaw has received extensive experience with analytical laboratory methods conducting a wide number of research projects in plant physiology and post-harvest physiology. Gaw was responsible for directing all laboratory operations and ensuring each staff member and UF student utilized best practices, from preparing sample tissue and reagents, maintaining a sterile, contaminant-free work environment (acid washing of all lab ware and surfaces), performing analysis and maintaining/calibrating the equipment, ordering/handling gases and all supplies, and summarizing and presenting data.

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Dr. Marcu served as a research associate for the development of the American Herbal Pharmacopeia's cannabis monograph. In this position, Dr. Marcu studied, analyzed, and wrote about all cannabis testing methods available today. He also also developed proprietary methods for detecting synthetic cannabinoids.

PRODUCT TESTING PLAN

Chestnut Hill Tree Farm is committed to producing only the safest of products. A robust testing plan will ensure the company's products are produced in accordance with good manufacturing practice and held to rigorous testing standards. Product testing will include analyses for potency, terpenes, heavy metals, solvents, pesticides, microbial contamination and shelf-life. Tests will be performed onsite by an independent third-party quality assurance consultant, Green Standard Diagnostic, led by Jahan Marcu. CannLabs, Inc. will provide further independent data review on all final products tested prior to releasing for distribution.

TESTING POLICIES

In-house testing protocols will not only ensure the safety, efficacy, and quality of products distributed to patients and reduce product liability, but will also serve the research and development purposes of the company. The product formulation team will make extensive use of the lab's resources in the continual improvement of its product offerings.

Chestnut Hill Tree Farm will provide all necessary instrumentation to Green Standard Diagnostics' experts in order for the company to consistently manufacture products that are pure, potent, and within product specifications. The testing of production components throughout the cultivation, processing, manufacturing, and finishing processes is a critical step to maintain these quality standards. The Quality Assurance Officer will oversee the testing protocols of the company and all quality assurance activities. Only the Quality Assurance Officer and properly trained Analytic Technicians may collect and transmit samples for testing purposes.

The laboratory will use methods that are appropriate for the tests performed and the materials being tested. Methods provided include those from compendia such as the AHP and USP monographs, methods validated by organizations such as the EPA, AOAC and EU, methods published in peer-reviewed journals and Green Standard Diagnostic's proprietary methods. In order to be scientifically valid, all methods are put through a formal validation process that demonstrates the ability of a method to produce reliable and repeatable results. All laboratory functions will be performed in compliance with Good Laboratory Practice ("GLP").

Green Standard Diagnostics has established methods for the following analyses:

- Potency
- Terpene
- Residual solvents
- Pesticide residuals
- Microbiologicals
- Alfatoxin and ochratoxin
- Heavy metals

The company will adopt certain allowable limits unless otherwise directed by the OCU. Any cannabis or cannabis product that does not meet standards will be disposed of or may be reworked and retested with the Quality Assurance Officer's approval.

QUARANTINE

The company will quarantine any lot of medical cannabis product and not transport, distribute or dispense such lot unless the Quality Assurance Officer releases the hold. Only the Quality Assurance Officer may release a batch of medical cannabis products for distribution to patients.

Chain of custody
A rigorous chain of custody will be maintained to ensure that medical cannabis products are not released for distribution until the batch is in compliance with all company policies and procedures. From the time that a batch has been packaged for distribution until the independent testing laboratory provides a report detailing passing results, the quality assurance unit shall segregate and withhold from use the entire batch, except the samples that have been removed for testing.

Product Security
Quarantined batches shall be held in storage with full camera coverage. All batches will be properly labeled for quarantine and entered into the inventory management system with a quarantined status. No batch shall be transferred from quarantine until the Quality Assurance Officer releases the batch in the system for transfer.

Storage Conditions
In addition to security requirements, strict environmental controls are required in all quarantine holding areas. All medical cannabis products must be housed in a sanitary area with optimal environmental conditions to preserve the identity, purity, and strength of the products. The Quality Assurance Officer shall determine the appropriate storage conditions for each product manufactured.

Training Required
All quality assurance employees will be trained by the Quality Assurance Officer to conform to the company's quarantine policies and procedures. No Analytics Technician may release batches from quarantine unless the Quality Assurance Officer approves and documents their authorization in the employee's training record.

TESTING REGIME
The Quality Assurance Officer may perform any test he or she deems necessary at any time and will establish the company's testing requirements and sample size required for in-process and finished products. No less than 2% of each batch will undergo testing. Generally, the Quality Assurance Officer will perform the following assays with the appropriate frequency needed to accomplish the goal of the testing:

- In process cannabis: potency testing to determine optimal harvest dates
- Processed cannabis: moisture content to determine optimal cure duration
- Finished cannabis: potency and terpene analysis prior to extraction and contaminant testing if the cannabis is suspected to be contaminated
- Extracted cannabis: potency and terpene testing to determine proper run times for each strain cultivated
- Decarboxylation process: potency and terpene monitoring to ensure full decarboxylation
- Separated cannabinoids: testing for identity, potency, contaminants, residuals, and metals prior to formulation
- Excipient and component: analysis for identity and purity with a certification of analysis is not provided
- Finished products: a full suite of testing prior to release

PESTICIDES, RESIDUAL SOLVENTS, AND HEAVY METALS
The company will only perform internal testing for pesticides, residual solvents, and heavy metals in the event the Quality Assurance Officer deems necessary. If contamination could be present in plant material or extracted oil due to suspect cultivation methods, components, excipients, or other contributing factors, the tests will be performed.

Chestnut Hill Tree Farms will also maintain a robust incoming inspection and supplier control program that will test and control manufacturing inputs to avoid product contamination and adulteration. If the laboratory detects an

adverse level of contaminants, all materials or products which compose the batch tested will be quarantined until an investigation determining the source of contamination is completed and a determination on batch status is made.

IDENTITY AND POTENCY

Potency and terpene testing will occur whenever necessary for formulation. Only independently validated laboratory test reports will be utilized for product labeling.

MICROBIOLOGICALS

The company will test all extracted oil for adverse microbiological levels prior to further manufacturing. If a batch is found to be contaminated per the tolerance limits established by the company, the Quality Assurance Officer will determine if remediation processes and retesting should occur or the batch should be disposed of in accordance with the company's waste disposal policies and procedures.

EXCIPIENT TESTING

Extracted oils may be formulated with excipients to create final products. All excipients will be required to have a certificate of analysis or be tested onsite to ensure that they do not adulterate any of the company's products.

FINAL PRODUCT TESTING

Product batches that have been packaged for distribution will be quarantined and will undergo final testing with validation by an independent lab. Only the Quality Officer or designee may release a batch of products for distribution. The quality assurance team will review the batch record, any in-process and final test results, the independent laboratory test results, and then compare to specifications and regulations to make a final decision on batch status including further hold for remediation, disposal due to failure, or release for distribution.

ACCEPTABLE LIMITS

The company has adopted the following minimum acceptable limits to be implemented unless otherwise directed by future legislation or regulation. Any cannabis product that does not meet the company's acceptable limit standards will be remediated at the company's discretion. All rework must be retested by the Quality Assurance Officer for approval. Any cannabis product that fails two rounds of testing will be destroyed in accordance with the company's waste policies.

Potency

All cannabis products distributed by the company must test at or below .8% THC volume by weight in accordance with statute.

Terpenes

No limits are applied to terpene quantification.

Heavy Metals

The American Herbal Products Association provides manufacturers of herbal products with general recommendations for maximum heavy metals levels in herbal products, based on the daily product intake amount. The most appropriate method for quantification of metals in medicinal products is an inductively coupled plasma-mass spectrometry ("ICP-MS") method of the US Food and Drug Administration ("FDA"), which analyzes arsenic,

cadmium, chromium, lead, mercury, and other heavy metals[1]. The cannabis monograph of the Netherlands OMC (2007) considers the risk of metal contamination of cannabis grown under controlled conditions to be low. The methodology found below will cover the subsequent list of heavy metals in the Elemental Analysis Manual for food and related products:

Metals	Limit µg/daily dose
Inorganic arsenic	10.0
Cadmium	4.1
Lead	6.0
Methyl mercury	2.0

Pesticides

Any pesticide/herbicide/fungicide used during production of the medical cannabis production can be tested using applied method validation protocols with the FDA's Pesticide Analytical Manual[2]. The company has adopted the most recent pesticide limits adopted in the State of Nevada as recommended by its appointed laboratory committee: For each specific analyte analyzed, the laboratory will verify that for any of the products listed that are used in cultivation, the residue is no greater than the concentration indicated as follows:

- Abamectins (Avermectin B1a and B1b) - 0.005ppm
- Acephate - 0.1ppm
- Acequinocyl - 0.02ppm
- Baygon (Propoxur) - 0.02ppm
- Bifenthrin - 0.05ppm
- Bifenazate - 0.1ppm
- Boscalid - 0.05ppm
- Captan - 0.05ppm
- Carbaryl - 0.02ppm
- Chlorpyrifos - 0.01ppm
- Cyfluthrin (Baythroid)- 0.01ppm
- Cypermethrin - 0.05ppm
- Diazinon - 0.05ppm
- Dichlorvos - 0.02ppm
- Dimethomorph - 0.05ppm
- Ethephon - 0.002ppm
- Etoxazole - 0.01ppm
- Fenpyroximate - 0.015ppm
- Fipronil - 0.01ppm
- Folicur (Tebuconazole) - 0.05ppm
- Hexythiazox - 0.02ppm
- Imazalil- 0.01ppm
- Imidacloprid - 0.02 ppm
- Imidan (phosmet) - 0.04ppm
- Malathion - 0.1ppm
- Metalaxyl - 0.02ppm
- Myclobutanil- 0.02ppm
- Omite (Propargite) - 0.1ppm

[1] http://www.fda.gov/Food/FoodScienceResearch/LaboratoryMethods/ucm2006954.htm
[2] http://www.fda.gov/Food/FoodScienceResearch/LaboratoryMethods/ucm2006955.htm

- Permethrin (cis 39%, trans 59%) - 0.05ppm
- Piperonyl butoxide - 0.1ppm
- Pymetrozin - 0.02ppm
- Pyraclostrobin - 0.02ppm
- Pyrethrins (mix of isomers) - 0.05ppm
- Quinoxyfen - 0.08ppm
- Resmethrin - 3ppm
- Spinosad - 0.01ppm
- Spirodiclofen - 0.01ppm
- Spiromesifen - 0.01ppm
- Systhane (myclobutanil) - 0.02ppm
- Tetrachlorvinphos (Z) - 0.05ppm
- Trifloxystrobin - 0.01ppm

Residual Solvents

The American Herbal Products Association provides manufacturers of herbal products with general recommendations for maximum residual solvent levels in herbal products, based on the daily product intake amount. The company will utilize CO2 known as safe for human consumption. For each specific analyte analysis, the laboratory will verify that for any of the products listed that were used in extraction, the residue is no greater than the concentration indicated as follows:

Solvent	**Limit mg/daily exposure**
Acetone	50
Ethyleneglycol	6.2
Heptane	50
Hexane	2.9
Isopropyl acetate	50

Microbial and fungal

The company has adopted the use of the most current American Herbal Pharmacopeia recommended limits for orally consumed botanical products in the US unless otherwise directed by new legislation or regulation.

CFU/g	Total viable aerobic bacteriat	Total yeast and mold	Total coliforms	Bile-tolerant gram-negative bacteria	E.coli (pathogenic strains) and Salmonella spp.
Unprocessed materials*	10^5	10^4	10^3	10^3	Not detected
Processed materials*	10^5	10^4	10^3	10^3	Not detected
CO_2 and solvent based extracts	10^4	10^3	10^2	10^2	Not detected

*Unprocessed materials include minimally processed crude cannabis preparations such as inflorescences, accumulated resin glands (kief), and compressed resin glands (hashish). Processed materials include various solid or liquid infused edible preparations, oils, topical preparations, and water-processed resin glands (“bubble hash”).

INSTRUMENTATION

The instrumentation selected by the company is fully documented in the application. Multiple instruments will be utilized in the internal laboratory; each instrument provides for a published or validated method for the type of analysis being performed including:

- UPLC/HPLC
- UPLC/MS/MS
- GC/MS
- GC/FID
- IPC/MS
- MDE
- qPCR

Equipment and instrumentation used for the analysis of test samples will be adequately inspected, cleaned, and maintained. Equipment or instrumentation used for the generation or measurement of data will be adequately tested and calibrated on a regular schedule.

Records will be maintained for all inspection, maintenance, testing, and calibrating operations. These records include the date of the operation, the person who performed it, the written procedure used, and any deviations from the written procedure. Records will also be kept for non-routine repairs performed on equipment as a result of failure and malfunction. Such records will document the nature of the repair, how and when the need for the repair was discovered, and any remedial action taken in response to the repair.

SAMPLE HANDLING

The Quality Assurance Officer will be responsible for preparation of testing samples for internal analysis. All necessary chain of custody documentation and laboratory management system entries must be completed prior to sample transfer from the cultivation or manufacturing units. Collection and retention of samples are handled in accordance with regulations and Good Laboratory Practice ("GLP"). Retention samples will be held for a period no less than two years after the product's expiration date.

CHEMICALS AND STANDARDS

All analytical reagents, solutions, and reference standards will be handled in accordance with GLP. They will be labeled appropriately and stored under appropriate conditions to minimize degradation or deterioration of the material in order to ensure accurate test results. Green Standard Diagnostics will acquire commercial reference standards for cannabinoids when they are available. Otherwise, the lab will internally produce reference standards since some of the rare cannabinoids are not commercially available as analytical grade standards. If internally produced, the laboratory will utilize appropriate analytical techniques to document the purity and concentration of the internally produced reference standards. The lab will obtain or, for internally-produced standards, create and maintain a certificate of analysis (COA) for each lot of reference standard.

RECORDKEEPING

The lab staff will fully document laboratory operations in laboratory notebooks and binders and in electronic record format. The company will utilize laboratory management software to maintain an accurate audit trail and chain of custody records for all cannabis and cannabis products handled by the lab. Procurement preference will be given to any laboratory management system with an integrated scale feature that can also integrate with the company's crop management, inventory control, and point of sale systems.

COMPONENT TESTING

The company has developed and adopted procedures for the testing of components that conform to best practice for the cannabis and pharmaceutical sectors. Testing will be performed on components used for the production of

the final medical cannabis product including but not limited to water or growing materials. Testing may also be performed on the final cannabis extract prior to packaging e.g. for cannabinoid profile verification or contaminant testing.

Strict controls will be implemented to validate and document all procedures including the testing of components. Generally, all operating units will be required to obtain certifications of analysis for components when available. Otherwise, operating Directors must qualify all vendors and register with the vendor to receive all applicable safety recall notices.

Some components requiring testing include soil, water, gases, chemicals, nutrients, and packaging. The company's quality assurance unit will possess testing capabilities for chemical and microbiological analysis. The laboratory will not provide required component testing unless it has validated a published method for the test to be performed. Green Standard Diagnostics will validate any internal standards created internally by the quality assurance unit.

Each operating unit Director establishes component testing protocols. Component validation is required throughout the company's production processes. Soil, water, CO2, and nutrients are tested throughout the cultivation process. The manufacturing process requires certification or testing for CO2, excipients, capsules, vaporizer cartridges, packaging, and labeling.

Testing of components including water and soil utilizing pH, EC, ORP, TDS, temperature or other basic meters may be performed by any properly trained employee. Visual inspection of manufacturing accessories (capsules, cartridges, etc.) and packaging and labeling components is required to ensure quality control over final products. The results of all component testing must be recorded in the appropriate logs or information management system.

PRODUCT CONSISTENCY

Each medical cannabis product, in its final form, will be analyzed and defined as having a specific concentration of total Tetrahydrocannabinol (THC) and total Cannabidiol (CBD) and shall have a consistent cannabinoid profile. The concentration of the following cannabinoids may be reported:

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

The company has adopted pharmaceutical standards for potency variance. The final medical cannabis product will not contain less than ninety-five percent (95%) or more than one hundred-five percent (105%) of the concentration of total THC or total CBD indicated on the label for the product. However, no product will be released that contains more than .8% THC by weight.

The company will formulate products utilizing only pure cannabinoids. This is accomplished through a separation (fracturing) process. The laboratory capabilities of the company ensure that all products can be precisely formulated to fall within the regulated strength limits of no more than .8% THC per dose.

Testing of all products in accordance with internal testing policies and procedures will validate all formulations. Additionally, independent lab testing of all products for distribution will be performed. No less than 2% of any manufacturing batch will be analyzed. Representative samples will be collected and maintained by the quality assurance unit in accordance with company policy and procedures and for retesting purposes. Random samples for testing

PRODUCT STABILITY

The company will demonstrate the stability of each product produced by performing stability testing that will:

- Determine the stability and expiration date of the final distributed medical cannabis product. The expiration date will be validated and stable for a minimum of 60 days under the specified storage conditions (light, temperature and humidity) when opened;
- Identify the shelf-life and expiration date of unopened medical cannabis products (e.g., packages or vials). Shelf-life determinations will be validated by ongoing stability testing according to a schedule determined by the Quality Assurance Officer; and
- Specify storage conditions once the package is sealed, during transport, at the dispensing facility, in the patient's home, and for samples retained for future testing.

Stability Policies

The company will routinely evaluate the stability of its cannabinoid concentrates and each medical cannabis product produced with validation by testing at an approved laboratory. The Quality Assurance Officer will oversee ongoing stability testing according to a determined schedule.

The Manufacturing Director will ensure the laboratory determined expiration date and specifications regarding storage conditions address storage at the manufacturing facility once the package is sealed, during transport, at the dispensing facility, in the patient's home, and for samples retained for future testing are properly applied in the company's Standard Operating Procedures, in packaging, labelling, and transport operations.

The company will ensure all products distributed in multiple dose re-sealable containers are stable for a minimum of sixty days after being opened as specified in the label directions and storage conditions of light, temperature, and humidity. The company will comply with all laboratory established stability testing plans and protocols.

Testing Plan

The stability testing plan will consist of accelerated stability @ 40ºC 75% Relative Humidity ("RH") for up to six months and long term room temperature stability @ 25ºC 60% RH for 3, 6, 9, 15 months and yearly thereafter. Based upon the product or cannabinoid concentrate characteristics alternate storage conditions, ICH (International Conference on Harmonization) guidelines may be utilized. Stability testing requirements will be defined in a written protocol and shall include:

- Sample size and test intervals based on statistical criteria for each attribute examined to assure valid product stability and expiration dating;
- Storage conditions for samples retained for testing;
- Reliable, meaningful and specific test methods; and
- Product testing in the same container-closure system as the product is distributed.

An adequate number of batches of each product brand, dosage form and packaging format will be tested to determine an appropriate expiration date.

Accelerated Studies

Accelerated studies, combined with basic stability information on the product composition and container-closure system, may be used to support tentative expiration dates provided full shelf life studies are not available and are being conducted. Where data from accelerated studies are used to project a tentative expiration date that is beyond a date supported by actual shelf life studies, long term room temperature testing at appropriate intervals will be performed until the tentative expiration date is verified or a more appropriate expiration date is determined.

Accelerated stability samples will be in the same packaging material as the final distributed product. In the event that a product is not stable under accelerated conditions, but is stable under room temperature conditions, then the room temperature stability data shall be utilized to establish the product's expiration dating.

Packaging and Storage

Long term room temperature stability samples will be in the final distributed packages. Package sizes will include the largest and smallest of any distributed product. Blister packaged samples will be counted as individual units and this stability shall be applicable to all distributed product regardless of the final package count. The first three batches of all distributed products will be placed into a long term room temperature stability program to confirm and eventually extend any expiration date previously assigned utilizing accelerated stability data.

Shelf-Life Determination

Product shelf life specifications will include all required storage conditions including storage at the manufacturing facility once the package is sealed, during transport, at the dispensing facility, in the patient's home and samples retained for future testing.

Analysis

All stability results will be promptly evaluated upon completing of each testing interval. Results will be tabulated as part of the evaluation and reviewed for deviations and adverse trends. A detailed decision tree is provided in the Standard Operating Procedures. All stability failures will be promptly investigated. This written investigation including any necessary corrective actions will be reviewed by the Quality Assurance Officer. Appropriate stability studies may be dropped from the stability program based upon the deletion of products from the production mix, revisions in product formulations, and packaging or other justifiable reasons as determined by the Quality Assurance Unit.

DEBORAH A. GAW – CHIEF FINANCIAL OFFICER

As a biological scientist at the University of Florida, Deborah Gaw was responsible for directing all laboratory operations and ensuring each staff member and UF student utilized best practices, from preparing sample tissue and reagents, maintaining a sterile, contaminant-free work environment (acid washing of all lab ware and surfaces), performing analysis and maintaining/calibrating the equipment, ordering/handling gases and all supplies, and summarizing and presenting data.

JILL LAMOUREUX - ADVISOR

As the operations advisor and business consultant to CannLabs, Inc., Jill Lamoureux understands the procedural needs of a laboratory and the day-to-day activities required for compliant and proper operation. Jill is an expert in the administrative requirements of operating a lab. She brings complete understanding of the equipment, chemicals, and storage procedures required for good laboratory practices in a large-scale cannabis analytics laboratory.

Based on her experience cultivating plants for condition specific cannabis medicines, Lamoureux developed one of the most robust quality control programs in the country. When properly implemented, these protocols ensure safe and pure cannabis medicinal products for patients. These protocols will be implemented by the company and supervised by the Quality Assurance Officer.

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SAMPLE HANDLING AND CONTROL

Green Standard Diagnostics has developed and adopted procedures for sample handling that conform to best practice for the cannabis and pharmaceutical sectors. The policies require that:

- A subset of each lot of medical cannabis product shall be retained to allow for testing in the future if necessary.
- The subset will be stored unopened as indicated on the label and in the original packaging and must be readily identifiable as belonging to its specific lot.
- The quantity retained shall be a statistically representative number of samples to allow for complete testing of the product again at least three times.
- The subset shall be retained for at least two years following the date of expiration.

SAMPLING TECHNICIANS

Sampling technicians must be separated from all cultivation and manufacturing operations. No quality assurance employee will be permitted to collect samples until the Quality Assurance Officer approves and documents his or her status as a sampling technician.

SAMPLING RISKS

Green Standard Diagnostics will establish controls overseen by the Quality Assurance Officer to prevent sampling risks including:

- Improper sample selection,
- Introduction of contaminants to the sample,
- Improper storage and/or handling of samples
- Exposure to environmental factors, and
- Sample tampering.

REPRESENTATIVE SAMPLES

Representative samples defined in the company's SOPs will be collected by approved quality assurance personnel from in-process materials, components, and final products. In-process cannabinoid profile testing will be completed throughout the cultivation process to determine optimal harvest times. Post-harvest testing shall be performed in-house and include cannabinoid profile and contaminant testing prior to further manufacturing. Post-manufacturing testing includes both in-house and external testing for potency and purity. Samples from all testing, internal and external, shall be retained for a minimum of two years. Sample documentation shall accurately reflect the origination of any sample to allow for efficient and accurate trace back.

SAMPLE COLLECTION

The cultivation and manufacturing units will notify the quality assurance staff of sample collection needs. The assigned sampling technician shall prepare all equipment and utensils needed to collect sufficient samples for the requested tests. All necessary measures to prevent sample contamination will be taken. Reserves samples of three times the necessary sample quantity for the test being performed will be collected for storage.

SAMPLE SELECTION

In determining a requisite sampling batch size, the company faces an inherent trade-off between representativeness in testing results and operating cost. A larger lot size eases the burden on the operation by requiring fewer tests. Since sampled cannabis products cannot be distributed to patients, a larger lot size decreases the dead loss of

unusable cannabis. However, in a large batch there may exist large amount of variation within the batch and a sample from within that batch might have drastically different properties than another part of that batch. This is the problem introduced by the heterogeneity of cannabis due to the biological properties of the plant.

Cannabis plants exhibit heterogeneity in two regards: across different parts within the same plant and across different plants within the same strain. Cannabis plants have been subject to intense domestication, both through breeding and cloning, creating a wide variety of strains each with their own biological peculiarities. Intra-plant heterogeneity is also important to sampling procedures. The company has adopted a policy identifying 2% of a batch to be a representative sample based on research provided by BOTEC Analysis Corporation. A two gram sample of flower or trim should allow for a confidence of approximately 12% relative variability (or five grams for a relative error of approximately 5%. 2.5 grams allows for an acceptable variation across a single sample[3].

The company's sample collection protocols require 2% of batch sampling for oil and finished products. However, Due to the variation in production methods, hard rules may not be possible to establish and there should be consideration afforded to the sampling technician to determine the proper sample selection process for any given situation. Documentation of the method of selecting the samples is mandatory.

SAMPLE TRANSPORTATION AND STORAGE

All samples will be placed into tamper proof sealed and sterile containers for transport to the laboratory facility. A controlled environment to prevent bacteria growth will be maintained for all transportation and storage activities. Samples will be stored for a minimum period of two years past the expiration date of the product sampled.

CHAIN OF CUSTODY

Contamination of the sample from environments, entities, and individuals invalidate the findings of the test results for that sample. Samples will be preserved in the state they were in the moment they were sampled and any outside environmental variables shall be minimized to the greatest extent possible. A rigorous chain of custody shall be maintained to ensure that samples are not in the custody of unauthorized individuals that might contaminate or invalidate any sample.

SAMPLE SECURITY

[redacted] All samples are tracked from initial receipt through disposal.

TRAINING REQUIRED

Sampling technicians will be trained by the Quality Assurance Officer to adhere to sampling policies and procedures. If the regulatory agency offers training and certification for sample collectors, employees shall be required to participate in such training. No Analytics Technician may collect samples until the Quality Assurance Officer approves and documents their capability in the employee's training record.

LABORATORY RECORDKEEPING

The Quality Assurance Officer will ensure the laboratory maintains records for the following laboratory activities:

[3] http://liq.wa.gov/publications/Marijuana/BOTEC%20reports/1e-Sampling-Lots-Final.pdf

1. Sample receiving, tracking, storage, and disposal.
2. Sample preparation, analysis, and documentation.
3. Standards preparation, documentation, handling, and storage.
4. Standards and chemical receiving, tracking, storage, and disposal.
5. Instrument and equipment operation and maintenance.
6. Data collection, handling, reporting, and storage.
7. Records pertinent to the quality of analytical data reported.
8. Analyst training records.
9. Monthly and yearly safety inspections and emergency responses.

ELECTRONIC RECORDS

The laboratory will maintain all company records in an electronic format. A cloud based back-up system will provide a second location for a duplicate copy of all records. The laboratory management system will be the primary database for all laboratory records. All independent laboratory records shall be maintained in the company's inventory control system and attached to the batch for which the report was issued.

PAPER RECORDS

The laboratory will maintain laboratory notebooks and worksheets. Additionally, quality assurance employee records may contain paper documents including training documentation forms. All human resources records will be maintained by Green Standard Diagnostics and securely stored in accordance with all employment laws. All paper records related to laboratory operations or personnel will be scanned and maintained in the laboratory management system. Laboratory notebooks and logs will be maintained in secure filing cabinets accessible by Quality Assurance Officer and his or her designees.

RECORD MAINTENANCE

In accordance with company policy, all electronic company records will be maintained for a minimum of five years. It is company policy to retain records in perpetuity unless a member of executive management determines the electronic record should be deleted or destroyed. Laboratory notebooks and other paper documents will be maintained for no less than five years. The Quality Assurance Officer will determine the need to destroy paper records. A log of any documents destroyed in the laboratory management system will be maintained and the Quality Assurance Officer will ensure all paper document destruction is performed by shredding.

JAHAN MARCU, PHD - ADVISOR

Jahan Marcu and his team of scientists of Green Standard Diagnostics shall assist the company in both quality assurance and scientific analytics. Jahan Marcu, Ph.D., is a cannabinoid research scientist, with expansive experience in quality assurance and groundbreaking research in the plant science and medicinal cannabinoid field including extraction science. Dr. Marcu brings strategic focus, vision, and mature judgment gained during a successful career guiding the creation of operational protocols while implementing scientific research and advisory services that generate sustained, consistent, positive results to the cannabis industry. He uses innovation and research to educate the world, devise medications and develop fundamental business practices that change the course of cannabis science. Dr. Marcu is currently the Director of Research and Development at Green Standard Diagnostics Inc., the Senior Scientist at Americans for Safe Access, and on the Board of Directors of the International Association for Cannabinoids as Medicine. Jahan Marcu is also a founder of the Patient Focused Certification program. He received his Ph.D. for significant contributions to the study of the structure and function of the CB1 receptor, and the role of the endocannabinoid system in bone. Dr. Marcu has vast knowledge of cannabinoid extraction for analytical and commercial purposes and will assist the company in hiring and training the Extraction Manager.

SHANNON WILSON - ADVISOR

Shannon Wilson is the owner and founder of Colorado-based Mahatma Concentrates. The award winning company's core belief is simple, to produce only the best, high quality cannabis extractions. This philosophy has resulted in Mahatma Concentrates being recognized through numerous industry awards.

- First place in best concentrates in the 2013 High Times Cannabis Cup;
- Second place in best cannabis concentrates in the 2013 710 Cup;
- First place in the best overall champion at the Daba-Doo Invitational in Amsterdam in 2013 and;
- Second place in best concentrates at the Hemp Connoisseur Championship in 2014.

Mahatma Concentrates is a recognized leader in extraction science. Wilson has extensive experience in design and managing extraction and refining operations. She regularly advises companies on extraction methods including live resin and hydrocarbon systems. Wilson has partnered with operators throughout the country to develop and implement extraction programs and assist in product develops, specializing in pre-filled cartridge technology.

Wilson is an active member of the National Cannabis Business Association, Cannabis Business Alliance, and Marijuana Industry Group. In addition, she is a founding member of Women Grow and currently serves as chairman for MIG's Concentrates Committee. Wilson is an ardent advocate for extraction safety and has spearheaded a safe consumption campaign. She offers valuable insight and expertise to the company, scaling a large manufacturing operation within a regulated environment successfully.

EXTRACTION, REFINING, AND SEPARATION OF CANNABINOIDS

The company has developed detailed protocols to efficiently and safely separate the active compounds of the cannabis plant that are responsible for the extensive array of medicinal benefits cannabis provides. Each employee hired on the extraction team shall be a qualified professional with experience or training in extraction techniques, purification, safety, manufacturing, and quality control processes. The company shall take all necessary precautions regarding operational procedures, manufacturing processes, storage, and packaging and labeling requirements of cannabis products in order to prevent contamination and mitigate risks while maintaining consistency of product constituents, packaging materials, and derivative products.

The company shall utilize a non-hydrocarbon extraction process for cannabinoid separation that allows for cannabis compounds to be extracted with little to zero damage and little to no toxicity involved in the application. Specifically, the company will utilize supercritical CO_2 as the preferred extraction method. Supercritical CO_2 provides naturally low toxicity levels and minimal environmental impact. The relatively low temperature of the process and stability of CO_2 allows cannabis compounds to be extracted with little or no damage to the active cannabinoids. CO_2 also allows for selective extractions due to the solubility of the extracted compounds in CO_2.

Supercritical CO_2 extraction methods allow precise separation of cannabinoids from the plant, which isolate its' purest substances for oil processing and product manufacturing. As the company values the safety of all employees and patients, we shall utilize CO_2 exclusively. The system poses minimal risk as CO_2 lacks volatility, solvent removal is simple and efficient, and extract quality can be well controlled.

The company's mission is to provide dependable, superior products that have not in any way been altered from its pure and final stage. The company will implement tightly controlled production standards and strict protocols to ensure all extracted products have been manufactured in a safe and clean environment designed for efficient operations.

RESPONSIBILITIES

The Extraction Manager will oversee policy compliance for all personnel under his or her supervision. The Manufacturing Director will maintain a current protocol for all extraction methods applied. Each extraction employee will have full training and demonstrate a complete understanding of all extraction protocols before they will be granted access to work in the extraction laboratory. Each employee is responsible for following the established protocol unless otherwise instructed by the Quality Assurance Officer or an executive manager. Any variance from the published protocol will be recorded.

The Quality Assurance Officer will ensure that all extraction operations follow current best practice. The Extraction Manager or an experienced Extraction Technician will perform a daily inspection to ensure that every employee within the laboratory is utilizing only safe and compliant practices.

The Quality Assurance Officer, in coordination with the Manufacturing Director, will ensure all extraction and manufacturing areas are maintained in a manner that prevents the contamination of any product constituents, cannabis, or contact surfaces. The Quality Assurance Officer is responsible for scheduling and overseeing repairs and maintenance of the production facility and all production equipment.

GUIDING PRINCIPLES

The company will only produce products that are both safe for patient consumption and safe to manufacture, stable in potency and purity, and effective for medicinal therapy. In regards to the planet and environment, the company

shall apply ecologically conscious operating protocols whenever possible. The company intends to manufacture products using only the highest quality solvents and extraction methods. The company believes in full transparency and shall disclose all information on methods and products used in extraction for patient review.

The company will not use any cannabis that contains harmful pesticide concentrations or other chemical additives for extraction purposes. In order to ensure the most effective medicinal benefits from the company's products, the company will ensure the use of high quality cannabis for extraction as well as in-depth training to ensure effective and safe production processes. In order to provide the highest yields and quality, the company shall only use cannabis flowers and sweet leaf trim to apply to extraction methods. Strict internal and external testing protocols ensure that all cannabis products are free from harmful contaminants, microbial bacteria, mildews, and molds.

All extraction processes will be developed based on experience and accepted science, and be operated in such a way that compounds can be extracted with little damage to cannabinoids and no toxicity residuals are left over from the procedure. The company intends to invest in current research in the plant science field and shall employ the most up-to-date, compliant, and effective methods of extraction.

SUPERCRITICAL EXTRACTION PROCESSES

The company will employ a closed loop CO_2 extraction system manufactured by Waters Corporation. Only 99.9% pure solvent will be utilized. All CO_2 used in extraction processes will be required to have a certificate of analysis. Multiple safety checks must be completed prior to the start of extraction operations. All CO_2 utilized in the process must be entirely evaporated from the cannabinoids before the extraction process is deemed complete. The extraction process must be monitored with preparative high-performance liquid chromatography until a minimum of 70% of the total cannabinoids and active compounds have been extracted. Applying HPLC technology allows the operation to separate and purify each different active compound of the cannabis plant into concentrates that are composed of specific, single or multiple, cannabinoids.

By fine-tuning both pressure and temperature, as well as utilizing CO_2 as a solvent, specific components may be extracted, while leaving behind everything else. The company intends to apply supercritical extraction methods using CO_2 as an extraction solvent regularly. The Quality Assurance Officer must approve all CO_2 equipment installed in the extraction facility. Initially, Waters Corporation Supercritical Fluid Extraction and Supercritical Fluid Chromatography separation systems will be utilized.

The company may process cannabis for extraction purposes that is wet, frozen, or dried. Cannabis will first be ground. The Extraction Technician will ensure instrument and receiving vessels are clean and free from any residual plant matter from the previous batch. The equipment will be washed, cleaned, and dried in between use. The grinding mill is housed in a room separate from the entire operation to prevent carryover or inadvertent manufacturing fumes from being incorporated into the grind. The grinding process allows for further visual inspection of raw cannabis to ensure that only the highest quality ingredients are used in producing extractions. Any discrepancies in quality will immediately be brought to the attention of the Director.

The ground material will be processed in a manner consistent with manufacturer instructions. The extraction will be monitored with HPLC until at least 70% of the cannabinoids have been extracted. The waxes will be precipitated overnight at -20°C. The oil is then placed in a rotary evaporator under vacuum and is heated to decarboxylate the cannabinoids. The final oil is then labeled and stored in an opaque glass bottle. The bottle is then stored in a refrigerator desiccator to prevent water intrusion and protect from sunlight.

The extracted oil will be separated and purified so that the different components of the input cannabis is isolated to specific, single, cannabinoids utilizing high pressure preparative chromatography. The resulting highly concentrated

and pure components can be used to ensure exact ratios of cannabinoids are available for use in the manufacture of consistent, reliable products. Typically, cannabinoid recovery is controlled by plant genetics and extraction processes. The company's fracturing process allows greater control and flexibility when formulating consistent products which allow for more precise correlations in clinical outcomes and lower cost medicines.

Finished cannabis oil will be stored in a cool, dark area in order to keep all terpenes intact. The company shall store all extracted materials in sanitized storage containers and an area that keeps a constant temperature to preserve the purity and potency of all products.

All employees trained to work within the extraction laboratory must be able to perform with scientific precision all functions required to properly remove all trace solvents from extracted cannabis concentrate. All concentrates must be tested to confirm that the products are completely 'purged' of the solvents used before they can be considered safe for consumption and distributed to patients. Any equipment used for the extraction process must be clean, sanitized, and free of any dust or residue as to not leave impurities in the final products. The Director of Quality Assurance Officer must ensure that final extracted products only consist of active compounds of the cannabis plant mainly containing cannabinoids.

SUSAN BAUMGARTNER, PHARM.D., MBA – CHIEF OPERATING OFFICER

Dr. Baumgartner's in-depth knowledge with respect to cannabis and routes of administration will ensure effective and successful product development and patient interactions. Susan Baumgartner shall apply her knowledge and research of plant science and pharmacology to provide the company with strategic direction and oversight of medical product development for various routes of administration. Dr. Baumgartner has expertise in all facets of medication use and knowledge of the effect of different compounds on the body and the effect of the body on different compounds following their administration.

CITIVA MEDICAL – DEVELOPMENT PARTNER

Chestnut Hill Tree Farm has engaged in a mutual licensing agreement with Citiva Medical. Citiva is a cannabis science company engaged in product development. Citiva Medical has a wide range of products that vary according to specific illness categories. They have garnered specific cannabinoid ratios from clinical and observational studies as well as physician and patient reported outcomes in order to create unique cannabinoid-based treatments and products. Citiva Medical is on the cutting edge of cannabinoid technology through its use and collection of proprietary genetic strains, collection of data, and knowledge of phyto-cannabinoids as they relate to the human endocannabinoid system. Citiva Medical is fast at work to create products aimed at a variety of illnesses and disease states by utilizing specific cannabinoid ratios. The company will both benefit from and contribute to this work.

MARGARET GEDDE, MD, PHD - ADVISOR

Margaret Gedde, M.D., Ph.D., is a Stanford-trained pathologist and award-winning researcher who founded Gedde Whole Health in 2004 and continues to lead this holistic, integrative medicine practice in both Colorado Springs and Buena Vista, CO. She is the founder of the Clinicians' Institute for Cannabis Medicine and the Medical Director of Vibrant Health Clinic.

Dr. Gedde specializes in the use of cannabis as a plant-based therapy that helps patients manage chronic pain, relieve nausea, and better manage their lifestyle while navigating multiple chronic health conditions. Dr. Gedde has experience in using cannabidiol (CBD) as a treatment for multiple indications, including the management of pediatric epilepsy. She presented her work ("Whole Cannabis Extract of High Concentration Cannabidol May Calm Seizures in Highly Refractory Pediatric Epilepsies") before the American Epilepsy Society in 2013. She has been published in 11 peer-reviewed journals.

Her previous experience includes providing alternative and holistic therapies in private practice in both Colorado and Hawaii. Before establishing her medical practice, Dr. Gedde specialized in the pre-clinical and clinical development of therapeutic agents in both staff and consulting roles in the pharmaceutical industry. At IntraBiotics Pharmaceuticals, she served as a Senior Scientist, Assistant Director, and Director responsible for developing the microbiology portions of anti-infective programs.

She received her Bachelors in Biochemistry from Columbia University, and her medical degree and Ph.D. in Biophysical Chemistry from Stanford University. She completed her residency (including serving as Chief Resident and providing clinical instruction) in the department of Pathology and Laboratory Medicine at the University of Pennsylvania. She was the Howard Hughes Medical Institute Physician Postdoctoral Fellow and conducted additional research in metabolism/pharmacology and developmental genetics at world-class institutions, including The Rockefeller University and Memorial Sloan-Kettering Cancer Center.

JAHAN MARCU, PHD - ADVISOR

Jahan Marcu and his team of scientists of Green Standard Diagnostics shall assist the company in developing products with differing routes of administration. Jahan Marcu, Ph.D., is a cannabinoid research scientist, who has contributed to groundbreaking research in the plant science and medicinal cannabinoid field including cannabinoid receptor science. Dr. Marcu brings strategic focus, vision, and mature judgment gained during a successful career guiding the creation of operational protocols while implementing scientific research and advisory services that generate sustained, consistent, positive results to the cannabis industry. He uses innovation and research to educate the world, devise medications, and develop fundamental business practices that change patients' lives. Dr. Marcu is currently the Director of Research and Development at Green Standard Diagnostics Inc., the Senior Scientist at Americans for Safe Access, and on the Board of Directors of the International Association for Cannabinoids as Medicine. Jahan Marcu is also a founder of the Patient Focused Certification program. He received his Ph.D. for significant contributions to the study of the structure and function of the CB1 receptor, and the role of the endocannabinoid system in bone.

JOSH STANLEY - ADVISOR

Josh Stanley is a leading medical cannabis entrepreneur and advocate working to advance the medical cannabis industry in the U.S. and throughout the world. Stanley brings to the company over eight years of experience working in the cannabis industry and additionally was one of the first individuals to open a medical cannabis dispensary in Denver, Colorado. Stanley has been heavily involved in responsible cannabis reform and began Colorado's political action committee and 501c4, the Medical Marijuana Industry Group, which he co-chaired. In 2010, Stanley assisted in the drafting of House Bill 1284, the first bill of its kind to further define and establish Colorado's medical cannabis state regulatory structure through the Colorado Department of Revenue. The following year he co-authored House Bill 1043 and was responsible for writing the research and development portion of the bill. Additionally, Stanley has developed rules and regulations for the Colorado Department of Revenue's Medical Marijuana Enforcement Division as well as the rules and sat on the rules and regulations board for research and development.

Stanley has been co-credited with creating a non-psychoactive strain of the cannabis plant with low-THC and high-CBD content. This specialized breed of sativa variety of medical cannabis has proven to be highly beneficial for varying degrees of epilepsy in both pediatric and adult patients. Stanley's effort to help children patients restore their lives with high-CBD cannabis extracts made international headlines in 2013 and was prominently featured on Sanjay Gupta's highly acclaimed CNN documentary in March of 2014. In addition, Stanley worked with the National Geographic Channel, who tracked his observational research studies and patient successes with medicinal cannabis in Colorado.

In April 2012, Stanley and his five brothers co-founded the "Realm of Caring," a nonprofit organization, committed to promoting a higher-quality of life for Coloradans affected by debilitating conditions through the use of non-smokable forms of concentrated CBD cannabis oil. In 2014, Josh founded "Strains of Hope," a nonprofit dedicated to assisting principalities across the globe in the implementation of responsible rules and regulations of the cannabis industry and to provide further medical research of the cannabis plant as it pertains to a variety of illnesses and disease states.

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RESEARCH AND DEVELOPMENT PARTNERSHIPS WITH GLOBAL LEADERS

Catalent

Chestnut Hill Tree Farm will collaborate with Catalent on the development of a reliable delivery system for low-THC cannabis. Catalent is the leading global provider of advanced delivery technologies and development solutions for drugs, biologics and consumer health products. With over 80 years serving the industry, Catalent has proven expertise in bringing more customer products to market faster, enhancing product performance and ensuring reliable clinical and commercial product supply. Catalent employs approximately 8,000 people, including over 1,000 scientists, at 30 facilities across 5 continents, and, in fiscal 2014, generated more than $1.8 billion in annual revenue. Catalent is headquartered in Somerset, New Jersey. Additional information about the company may be found at www.catalent.com.

Patheon

Chestnut Hill Tree Farm may also collaborate with Patheon® on the development of a reliable delivery system for low-THC cannabis. Patheon is a leading provider of drug substance and drug product services for the global biopharmaceutical industry. Patheon, a business unit of DPx Holdings B.V., delivers a combination of unrivaled quality, reliability and compliance, with a reputation for scientific and technical excellence to customers in the pharmaceutical and biopharma sector. A leading global provider, Patheon offers a comprehensive set of solutions to help customers of all sizes satisfy complex development and manufacturing needs at any stage of the pharmaceutical development cycle. Patheon's global operations include more than 8,000 scientific and professional staff at 12 commercial-scale finished dose form facilities, three API manufacturing and development operations, four biologic drug operations, one biosolution facility and nine pharmaceutical development centers across North America, Europe, Latin America, Asia and Australia. Patheon's development and commercial manufacturing capabilities cover primarily prescription products in solid and sterile dosage forms, as well as specialized capabilities in high potency, controlled/sustained release, and sterile manufacturing, including aseptic filling and lyophilization. Patheon has relevant experience in the development and manufacturing of Marinol® (dronabinol) capsules. Dronabinol is synthetic delta-9 tetrahydrocannabinol (delta-9-THC). Delta-9 THC is a naturally occurring component

of Cannabis sativa L. (marijuana). Dronabinol is a light yellow resinous oil that is sticky at room temperature and has similar physicochemical properties to other cannabis-derived oils containing cannabinoids. Marinol® is supplied as round, soft gelatin capsules and manufactured by Banner Life Sciences™, a business unit of Patheon, in High Point, North Carolina. Additional information about the company may be found at www.patheon.com.

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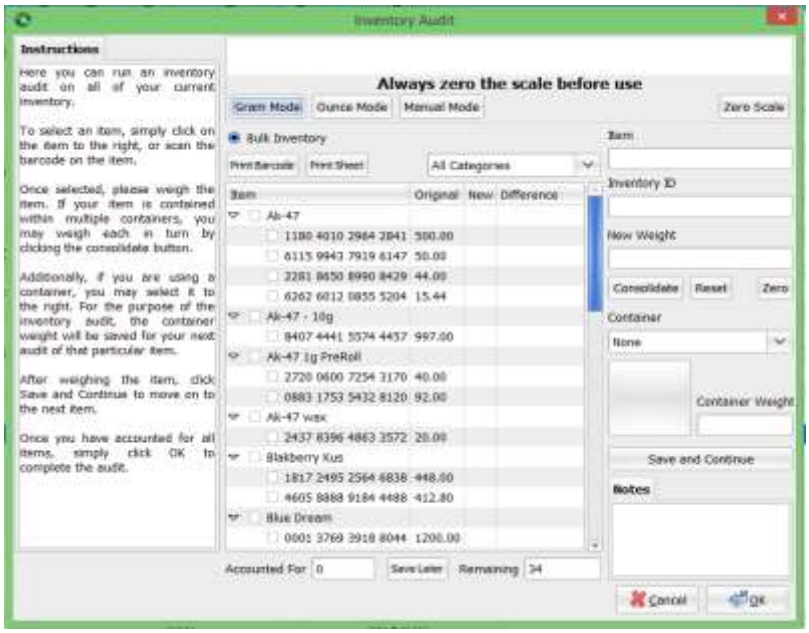
SUSAN BAUMGARTNER, PHARM.D., MBA

Dr. Baumgartner has professional training as a pharmacist and significant knowledge of therapeutic agents for disease management and prevention. Her past experiences in the medical field provide the company with expert knowledge of drug development, clinical trials, and observational studies involving pharmaceutical products. She also brings a deep knowledge of medicinal cannabis with respect to routes of administration. Dr. Baumgartner's proficiency in pharmacology and medication use will aid the company in providing the most effective delivery systems for its patients, including efficient formulations of the therapeutic cannabinoid, CBD, and development of a controlled-release capsule.

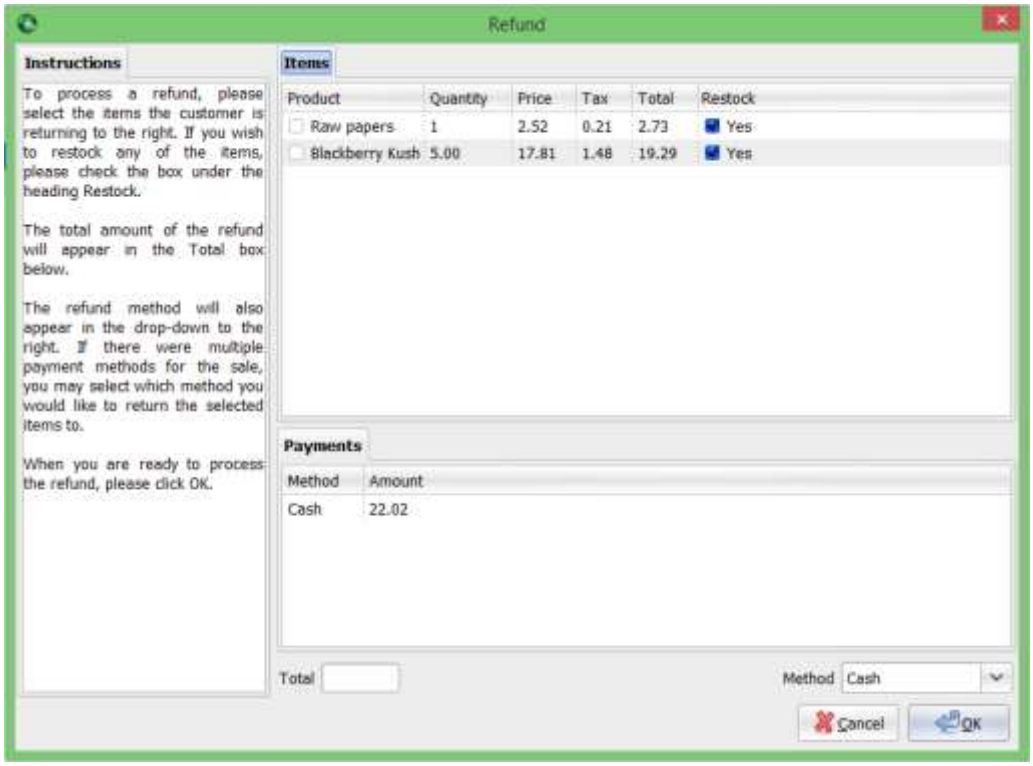
Dr. Baumgartner has managed adverse event reporting and recalls related to pharmaceutical products in compliance with FDA reporting requirements. Her experience in quality assurance and compliance will help the company manage product risk and reduce product liability. Dr. Baumgartner's in-depth knowledge with respect to cannabis and routes of administration will ensure effective and successful patient interactions. Her experience designing and implementing successful training programs for employees, including managers, individual contributors, and cross-functional teams will assist the company in educating and managing a skilled and professional workforce.

BIOTRACKTHC

BioTrackTHC enables Chestnut Hill Tree Farm to collect, store, and retrieve all data and activity. All inventory records, patient records, recall reports, sales/transaction records, product disposal records, and all scanned documents can be accessed at any time (real time), either in-system or through the report creation tool. Though system actions can be adjusted or voided, at no time is any data ever fully deleted as BioTrackTHC maintains a log of every action, including adjustments and voids, so that the entire history of the system may be reconstructed. The availability and report ability of the system data enables the said entity to produce any information necessary for the OCU during an inspection or at their request. The Plant/Inventory Historical Report has the ability to trace the source plants for a given product, any flower or byproducts created from those plants as well as any wholesale or retail sale with the contact information for each person it was sold to. This report tracks every gram contained in a batch, including but not limited to, all products derived from the plant, the contact information for the purchaser, and all vendor information and transport logs.



In the event of a recall, permitted users can quickly pull reports of all products and transactions associated with a specific plant(s), batch or strain. Within the system the licensed entity will be able to quickly and easily find the remaining product, the locations (i.e. patients) delivered to as well as all sources and derivatives of the product. Once the affected individuals have been identified, because the individual contact preferences have already been logged, timely communication is accessible. BioTrackTHC also provides a method of sending SMS(text) message or emails, which can even be targeted to just the patients who've purchased a specific product within a given time period, (all at no cost or SMS usage rates to the patients).



BRADY BLAKE - CONSULTANT

Brady Blake has experience producing cannabis products. Blake began directing company practices at Colorado Alternative Medicine in 2010, a highly recognized medical cannabis center known for their industry leading focus on having quality product for their patients. Blake began working in the product-processing department, and was promoted multiple times. Currently, he holds the title of facility manager, directing all cultivation operations. This position required the oversight of operational procedures and protocols, inventory control, and packaging and labeling departments. Blake commonly managed fifteen employees, ensuring each company staff member utilized good manufacturing practices.

Blake's pervasive knowledge regarding the cultivation of cannabis and the crop's medicinal properties causes him to be a valuable asset to the company's business model and future patients. He has personally worked with and cultivated over one hundred strains of cannabis for human consumption, and has a deep understanding of each strain's particular medicinal benefits and relief of ailments. His continual research in the development of products will bring years of experience to Chestnut Hill Tree Farm's product line. Blake's past experience with soft skills training, combined with his naturally compassionate attitude, help him articulate the effects of medicinal cannabis to current and future patients. Blake is driven to educate the public on the medicinal therapies cannabis provides and produce high-grade, quality medicine.

CITIVA MEDICAL – DEVELOPMENT PARTNER

Citiva brings forty years of experience in food grade manufacturing combined with the expertise of an internationally recognized nutrition company; their manufacturing division is uniquely positioned to develop the most trusted medicinal cannabis products in the world. Citiva Medical has a wide range of products that vary according to specific illness categories. They have garnered specific cannabinoid ratios from clinical and observational studies as well as physician and patient reported outcomes in order to create unique cannabinoid-based treatments and products. Chestnut Hill Tree Farm will have access to these proprietary illness-targeted formulations through the exclusive licensing agreement with Citiva Medical.

JAHAN MARCU, PHD - ADVISOR

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Mahatma Concentrates is a recognized leader in extraction science. Wilson has extensive experience in design and managing extraction and refining operations. She regularly advises companies on extraction methods including live resin and hydrocarbon systems. Wilson has partnered with operators throughout the country to develop and implement extraction programs and assist in product develops, specializing in pre-filled cartridge technology.

CBD

The Florida medical cannabis law recognizes the medicinal benefit of CBD. Numerous studies suggest that CBD offers natural protection against the intoxicating effects of THC such as memory impairment and paranoia[5]. Additionally, a number of studies demonstrate a synergistic action (the entourage effect) between these two cannabinoids can be more beneficial than the sum of the individual parts.

CBD is thought to have beneficial effects for many conditions including in the treatment of cancer. Dr. Mark Sircus concluded, "Of the five cannabinoids tested: CBD, CBG, CBC; CBD-A and THC-A, it was found that CBD is the most potent inhibitor of cancer cell growth. Taken together, these data might set the bases for a cannabinoid therapy for the management of breast cancer."[6] Recently, a clinical trial related to the synergistic action of CBD and THC as a novel treatment for glioblastoma in cancer patients found that "…results suggest that the addition of cannabidiol to Delta(9)-THC may improve the overall effectiveness of Delta(9)-THC in the treatment of glioblastoma in cancer patients."[7] The company's science advisor, Dr. Jahan Marcu is one of this study's authors.

THC

The company provides formulations with high CBD and low or no THC content. The formulations provide options to patients seeking the synergistic effects of THC combined with CBD. These formulas comply with the legal THC limit and do not present the intoxicating effects of high THC products. Two formulations are developed without THC. These may be appropriate for pediatric administration or patients that react poorly to any dosage of THC. Labelling for products containing THC in particular will include instructions to patients to exercise caution when beginning treatments with formulas containing THC due to its psychoactive effects.

PRODUCT MANUFACTURING UNIT

The company's manufacturing operations are organized by function. The Manufacturing Director is responsible for extraction, manufacturing, packaging, and labeling cannabis products. The manufacturing unit works closely with the cultivation to ensure proper handling throughout the plants life cycle. The Quality Assurance Officer provides quality control support to these activities. Full compliance with the policies and procedures detailed in the company's Standard Operating Procedures (SOPs) is required from all employees. In addition to procedural compliance, Directors are responsible for oversight and training of all employees, quality control functions, and the manufacture of safe and effective medical cannabis products.

All manufacturing practices will be fully documented in detailed records maintained in accordance with regulation and company policies. The Manufacturing Director will oversee extraction, formulation, and packaging operations and maintain all manufacturing records. These records will be made available for inspection by Quality Assurance employees and any authorized representatives of public health agencies, law enforcement, or the OCU upon request.

Additional provisions regarding sanitation, quality assurance, and related testing practices are detailed throughout the company's policies and procedures. Safety practices will be highlighted in all manufacturing operations. The

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[5] Niesink RJM, van Laar MW. Does Cannabidiol Protect Against Adverse Psychological Effects of THC? *Frontiers in Psychiatry*. 2013;4:130.

[6] Medical Marijuana, Treatments of: Cancer, Radiation Exposure, Neurological Conditions, Autism, Pain, Stress, and Emotional Upset. Dr Mark Sircus, AC., OMD. Lulu Press, Inc, 2014. ISBN 1312414758, 9781212414754; http://drsircus.com/books/e-book/medical-cannabis

[7] Marcu, J. P., Christian, R. T., Lau, D., Zielinski, A. J., Horowitz, M. P., Lee, J. McAllister, S. D. (2010). Cannabidiol enhances the inhibitory effects of Δ^9-tetrahydrocannabinol on human glioblastoma cell proliferation and survival. *Molecular Cancer Therapeutics*, *9*(1), 180–189. doi:10.1158/1535-7163.MCT-09-0407

entire organization is committed to work systemically to ensure that the company fosters a culture of quality and safety, while executing the most effective operation possible.

MASTER AND BATCH PRODUCTION RECORDS

All company products will be formulated and verified post-harvest to ensure formulations are consistent with extraction outputs.

PACKAGING OPERATIONS

The company will incorporate several elements related to packaging in order to meet cGMP requirements of the Quality System FDA regulation which are strictly controlled under the quality assurance program. Packaging protocols as defined by the company's SOPs detailed in Section 6 will ensure that packaging consistently meets the GMP master record requirements that control the packaging process.

Requirements

The Manufacturing Director is responsible for oversight of all manufacturing and packaging responsibilities, the most crucial of which include:

- Ensuring packaging and labeling personnel follow all requirements of the company's policies and procedures.
- Confirming all packaging and components are safe for use and meet applicable regulations. All medical cannabis products will be packaged in packaging that is:
- Child-resistant
- Tamper-proof/tamper-evident
- Resistant to light degradation
- All multiple dose product packaging will include a re-sealable package design that minimizes oxygen exposure.

SOPs fully document all packaging and labeling operations to ensure the quality and purity of the company's products is maintained throughout the packaging process. To manage compliance in labeling and packaging, the company will use batch production software, an electronic batch record software and SOP system that reinforces compliance with cGMP. Batch production software has been selected to supplement Inventory management system for manufacturing because GMP requirements are built into the software and SOPs are available with the system. These features are necessary for the operation and are not available in Inventory management system. The system is a solution for organizing batch records and documentation while maintaining GMP compliance.

Inspection

The company requires the inspection and testing of all incoming materials including packaging. Packaging has been selected for use in operations and verified for compliance with OCU regulations and FDA requirements. The company will package medical cannabis products in packaging that is:

- Child-resistant
- Tamper-proof/tamper-evident
- Light-resistant
- Re-sealable
- Designed to minimize oxygen exposure
- Certified compliant with the Poison Prevention Packaging Act of 1970
- In the event that packaging not meeting these standards needs to be used in the operation, the non-compliant package be placed in a secondary package that meets the standards.

Integrity
The company has identified the following goals for it packaging line:

- To select packaging that preserves product quality
- To ensure all packaging is tamper resistant and childproof
- To develop packaging that educates patients in clear and simple language about the product.

The company will utilize three step packaging operations following these steps:

- Products will be packaged in useful modalities that a wide spectrum of ages and health ranges can use effectively.
- Products will be further packaged with tamper-evident shrink bands or in tamper-evident pouches. Tamper-evident packages will be light resistant and minimize oxygen exposure.
- Products will be even further packaged with inserts providing appropriate educational and compliance information on risks and benefits, warnings and precautions, abuse, and dependence.

Packaging Lines
Custom packaging lines have been sourced and will be designed to link with manufacturing machines to package and label the company's products. Each custom packaging line will count individual products into units of 30 and package each unit into packaging as outlined in this section.

Packaging Equipment
The use of equipment in packaging operations will be limited to trained employees familiar with the requirements and any potential hazards related to packaging operations. Employees will be provided all required personal protective equipment necessary for packaging operations.

Hand Packaging
In the event that hand packaging is required, sterile gloves, and sanitized utensils will be used. Hand packaging operations will only take place on a work surface that has been sanitized immediately prior to use. All hand-packaging operations will be supervised by a manager.

LABELING OPERATIONS
Quality Control
The company will incorporate in their quality assurance program several elements that relate to labeling in order to meet the cGMP requirements found in the FDA Quality Systems standards. The quality assurance program will ensure that labeling meets all GMP device master record requirements with respect to legibility, adhesion, etc., and that labeling operations are controlled to guarantee correct labeling for every operation. All printed packaging and labeling materials, including preprinted containers, inserts, and pre-printed packaging materials, will be stored in an area and manner suitable to prevent mixups.

Product labeling will be color coded with ratios clearly marked to prevent mix-ups. The label and labeling used for each production unit, lot, or batch will be documented in batch production records Strict protocols restrict access to label stock to trained Technicians and the Manufacturing Director.

Design
Each approved medical cannabis product will be affixed with a product label. Each product label will be applied at the manufacturing facility, be easily readable and firmly affixed. The Quality Assurance Officer, in coordination with

the Medical Director will determine the necessary labeling and insert information required for each formulation and delivery method produced. Labels may include, but are not limited to the following information:

- Name, address, telephone number, and registration number of the Dispensing Organization'
- Medical cannabis product form and brand designation;
- Single dose THC and CBD content for the product set forth in milligrams (mg);
- Medical cannabis product lot unique identifier (lot number or bar code);
- Quantity included in the package;
- Date packaged;
- Date dispensed;
- Date of expiration of the product:
- Proper storage conditions;
- Name, address, and registration number of the registered patient;
- Specific directions for use, including but not limited to the dosage and frequency of dosage, and the maximum daily dosage; and
- The following warnings:
    1. Medical cannabis products must be kept in the original container in which they were dispensed and removed from the original container only when ready for use by the certified patient.
    2. Keep secured at all times.
    3. May not be resold or transferred to another person.
    4. This product might impair your ability to drive.
    5. KEEP THIS PRODUCT AWAY FROM CHILDREN (unless medical cannabis product is being given to the child under a practitioner's care).
    6. This product is for medicinal use only.
    7. Women should not consume during pregnancy or while breastfeeding except on the advice of the certifying practitioner, and in the case of breastfeeding mothers, including the infant's pediatrician.

Expiration dates will reflect the time after final packaging during which the product form is fit for its intended use when stored and used per its labeling. The company will require stability test data as required by regulation including shelf life testing to establish all product expiration dates. The Quality Assurance Officer will ensure that all expiration dates conform to stability test results.

Inspection

The company requires the inspection and testing of all incoming materials including labeling. Labels will be reviewed, proofread, and verified for all data compliance points from FDA requirements.

- New labels will be held in quarantine until they are examined for accuracy.
- Acceptance or rejection will be documented.
- Any rejected labels will be destroyed.
- Release is authorized by the signature of a Packaging and Labeling Technician and the Manufacturing Director.

Integrity

All labels will be designed and applied to product form packaging so that the labels will remain in place and legible during the customary conditions of distribution, storage, and use. Likewise, other labeling, such as user instructions, should remain legible during customary storage and use.

Labeling Process

All labeling and packaging operations have been designed as separate functions to prevent mix-ups between similar products or labels. Additionally, labeling and packaging will be processed at different times for different products.

Before beginning any labeling operation in which a mix-up could occur, the production area and equipment for the operation will 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 will be cleared of labels, packaging, and other materials used in the previous operation.

All labels used in labeling operations will be documented including the quantities of labels or labeling issued, used, and returned to storage. Narrow limits for the labeling reconciliation will be established, utilizing historical operating data when available to determine the amount of allowed variation in the labeling reconciliation. When a labeling reconciliation falls outside the allowed limits, the quality assurance team will conduct an investigation of the batch and determine, to the extent possible, the source of the discrepancy. The deviation will be documented, explained, and approved the unit. The company policies require the destruction of all excess labeling bearing batch, lot, or control numbers.

When issued for use, labeling will be carefully examined to make certain the contents of the labeling comply with the labeling specifications in the master record for the specific product form and brand ratios being produced. This examination will include any control numbers or expiration dates used on the labels. Documentation of the inspection, including the date and name of the person performing the examination will be entered into the GMP software.

Label Changes

Labeling is part of the master record; therefore, all changes to labeling will be made in the formal change control system housed in the batch production record software. Any changes to labeling will be formally reviewed and authorized by the Manufacturing Director and the Director of Science before implementation. When making changes to formulation aspects of a product form and to primary documentation, the review group housed in the Science OCU will determine if any secondary items such as labels or instructions are affected and also need changing. It is the responsibility of the Director of Science to inform the Director of Marketing that a change in labeling content needs to be made. All new label proofs will be reviewed and approved by the Chief Science Officer.

Over-labeling

Over-labeling by placing a new label over an old label is discouraged by the FDA and is unacceptable as a policy in the operation.

Safety Inserts

The dispensing facility will include with each product package dispensed to a patient, an OCU-approved package safety insert. Information provided will include but not be limited to:

- The medical cannabis product and brand;
- A list of any excipients used;
- A warning if there is any potential for allergens in the medical cannabis product;
- Contraindications;
- More specific dosage directions and instructions for administration;
- Warning of adverse effects and/or any potential dangers stemming from the use of medical cannabis;
- Instructions for reporting adverse effects as may be determined by the OCU;
- A warning about driving, operation of mechanical equipment, child care, or making important decisions while under the influence of medical cannabis;
- Information on tolerance, dependence, withdrawal, and substance abuse; how to recognize what may be problematic usage of medical cannabis; and how to obtain appropriate services or treatment;
- Advice on how to keep the medical cannabis product secure;

- Language stating that the certified patient may not distribute any medical cannabis product to anyone else;
- Language stating that unwanted, excess, or contaminated medical cannabis product will be disposed of according to disposal policies; and
- Language stating that "this product has not been analyzed by the FDA. There is limited information on the side effects of using this product and there may be associated health risks."

HOLDING, STORAGE, AND TRANSFER OPERATIONS

It is critical that all holding and storage operations maintain the quality and purity of all products. The Manufacturing Director will be responsible for developing, implementing, and maintaining storage area procedures that ensure compliance with best practice and regulations. All storage areas will be maintained in a clean and orderly condition, free from infestation by pests of any kind, and in accordance with security requirements established by the OCU. All holding areas including safes and vaults and any other areas used for holding or storage of cannabis and medical cannabis products will be securely locked and protected from entry at all times, except for the actual time required to remove or replace cannabis. Surveillance camera(s) will monitor all storage areas with an unobstructed field of view.

The facility is designed to provide adequate lighting, ventilation, temperature, humidity, space, and equipment for holding and storage operations. Separate areas are available to store cannabis and products that are outdated, damaged, deteriorated, mislabeled, or contaminated, or whose containers or packaging have been opened or breached until disposal in accordance with policies and procedures.

All storage areas will be maintained in a clean and orderly condition, and will be free from infestation by insects, rodents, birds, and pests of any kind. Storage areas will be securely locked and protected from entry, except for the actual time required to remove or replace cannabis or approved medical cannabis products.

Environmental Controls

The facility's storage areas have been designed for ease of maintenance. The Manufacturing Director will ensure these areas remain dry, well ventilated, and have sufficient insulation or other temperature-control features to avoid extreme temperature fluctuations. The company may incorporate a humidifier or dehumidifier if needed. Storage areas will utilize and maintain carbon filtration or other means of odor control.

Products that can support the rapid growth of undesirable microorganisms as determined by the Director will be held in a manner that prevents the growth of these microorganisms.

Security

The Security Officer in coordination with the Manufacturing Director will be responsible for the monitoring the secure storage of medical cannabis. The Security Officer will develop, implement, and maintain storage area procedures that ensure the following processes:

- All cannabis in the process of cultivation, production, preparation, transport, or analysis will be housed and stored in such a manner as to prevent diversion, theft, or loss.
- Any cannabis items such items will be accessible only to the minimum number of specifically authorized employees essential for efficient operations.
- Access to cannabis and medical cannabis products will be restricted by the Security Officer. Only necessary personnel will receive access rights housing cannabis, medical cannabis products, or cash.
- All cannabis and medical cannabis products will be returned to a secure, locked area at the end of any process (i.e., trimming, manufacturing, etc.) or at the end of the day (i.e., dispensary products on display).

- If a manufacturing process cannot be completed by the end of a working day, the employee responsible for closing the facility will ensure the processing area, or containers containing cannabis are locked inside an area with adequate security as determined by the Director.

3.B.1.i. Any awards, recognition or certifications received for relevant expertise.

SUSAN BAUMGARTNER, PHARM.D., MBA

Susan Baumgartner is a Doctor of Pharmacy and Master of Business Administration; both degrees were earned with the highest honors. She has completed HIPAA training and possesses significant experience handling confidential information.

- Key member of Executive Management Team and Board of Directors for a startup company in Alachua County that licensed patient monitoring technologies from the University of Florida.
- Vice President's Distinguished Service Award and Marketer of the Year Award at Merck
- Perry A. Foote Award for Distinguished Scholarship (Top Graduate in the Doctor of Pharmacy Program)
- American Pharmaceutical Association – Academy of Students of Pharmacy Mortar and Pestle Professionalism Award
- Beta Gamma Sigma Business Honor Society
- Member, National Advisory Board for University of Florida College of Pharmacy (2008 – 2009)
- University of Florida Outstanding Young Alumni Award (2007)

JILL LAMOUREUX - ADVISOR

The company's operations advisor, Jill Lamoureux, has been recognized as national leader in the medical cannabis industry for many years. She serves as an independent advisor to municipalities, state legislators, regulators, and private companies. Her operations served as a model across the country and excelled in patient education and services. Westword Magazine featured her dispensary in Boulder, Colorado as a clean, hospitable environment staffed by genuinely nice people; "I was as impressed by the professional atmosphere and friendly nature of the staff as I was by the potency of the cannabis. This dispensary takes a measured approach to [operations], tempering a wide selection of [medical] high-grade with a huge dose of patient education and wellness services."

- American Herbal Products Association Cannabis Committee, 2013-Current
- ASA Foundation Executive Cannabis Audit Committee, 2013-Current
- BOTEC Analysis Corporation Subject Matter Expert, 2013-Current
- National Cannabis Industry Association, Chair, 2010-2012
- City of Denver Medical Cannabis Workgroup, 2011-2012
- Colorado Department of Revenue Medical Cannabis Rulemaking Workgroup, 2009-2012
- Colorado Department of Health and Public Environment Medical Cannabis Workgroup, 2009-2010

KRISTOPHER M. PALMER - CONSULTANT

Kristopher Palmer is a Nationally Certified Thermographer, certified by the Infrared Training Center. This has allowed him to apply thermal imaging to cultivation operations to improve garden and building efficiencies.

SHANNON WILSON – ADVISOR

Shannon Wilson is the owner and founder of Colorado-based Mahatma Concentrates. The award winning company's core belief is simple, to produce only the best, high quality cannabis extractions. This philosophy has resulted in Mahatma Concentrates being recognized through numerous industry awards.

- First place in best concentrates in the 2013 High Times Cannabis Cup;
- Second place in best cannabis concentrates in the 2013 710 Cup;
- First place in the best overall champion at the Daba-Doo Invitational in Amsterdam in 2013 and;

- Second place in best concentrates at the Hemp Connoisseur Championship in 2014.

Wilson is an active member of the National Cannabis Business Association, Cannabis Business Alliance, and Marijuana Industry Group. In addition, she is a founding member of Women Grow and currently serves as chairman for MIG's Concentrates Committee. Wilson is an ardent advocate for extraction safety and has spearheaded a safe consumption campaign. She offers valuable insight and expertise to the company, scaling a large manufacturing operation within a regulated environment successfully.

3.B.1.i. Any awards, recognition or certifications received for relevant expertise.

2. INFRASTRUCTURE

Part 3.B.2.a. Vehicles that will be used to transport product among cultivating, processing, and dispensing facilities

Chestnut Hill Tree Farm has selected to purchase two Toyota Prius vehicles with customized climate controlled cargo areas and [redacted]

The manifests provided also contain signature lines creating another level of accountability confirming proper receipt has occurred. This information can be maintained, verified and scanned directly into the BioTrackTHC system for clerical preservation. The manifest is archived within the system and can be quickly made available upon request by the OCU or law enforcement.

COMMUNICATIONS NETWORKS AND HARDWARE

Chestnut Hill Tree Farm currently and will continue to utilize the following communications software and hardware:

- ESI 50 LITE Communication Server and Phones 2 wire digital Phone System, maintained by Florida Phone Systems.
- Hi Speed DSL from Windstream Communications
- Cell phones to communicate through AT&T

The systems and hardware described above serve as the infrastructure for the company's communication systems. These systems will be maintained regularly. Additionally, the company's policies and procedures provide direction for company operations when critical information systems go down. The BioTrackTHC point of sale system is server based and is developed to automatically update when communication systems come back on line. Cells phones and landlines provide redundancy for voice communications.

BIOTRACKTHC

BioTrackTHC has messaging and email capabilities within the system. This allows managers and employees to communicate with one another without having to open another program or use their cellphones. A manager can send a task list to an employee that is viewable on the same screen where they are inputting data or performing any function within the system.

INTER-COMPANY COMMUNICATIONS

Chestnut Hill Tree Farm has also adopted protocols for internal communications. Due to the highly regulated nature of the company's operation, the quick and effective dissemination of information to employees is critical. Efficient communication is necessary for compliant and efficient operations. Effective internal communication promotes a culture that values employees and enables the company to achieve its strategic goals. The company's internal communications plan addresses the channels used to communicate with internal stakeholders. While the company seeks to foster a culture of inclusion in information sharing, dialogue and decision-making, it should be noted that there may be decisions made at the executive level that cannot, by their nature, be the subject of institution-wide consensus. The protection of private information related to patients and corporate trade secrets is a top priority for management.

In addition to direct means of communication (person-to-person and telephone), the company provides and expects all employees to use and to be aware of the information distributed via the primary means of inter-company communication:

- Electronic mail and calendar
- Voice mail
- Intranet

Official company communication may be sent by any of these above means. All employees are expected, on a regular basis, to accept their mail communication within a reasonable time period from the date of receipt. Employees should also make it known to their supervisor when a communication is not understood; and suggest when and how information could have been communicated more effectively.

OBJECTIVES

- To ensure effective one-way dissemination of information to employees.

- To take advantage of opportunities for dialogue with employees and upward communication.

ONE-WAY COMMUNICATION

The company seeks to provide free and open access for employees to sufficient, consistent, and timely information regarding internal plans and actions so that they are well informed and able to work effectively and in compliance with regulations and company policies and procedures. The company will implement the following one-way communication methods:

- Every employee receives a copy of the company's strategic plan, which includes the organization's mission, vision, values statement, strategic goals and strategies about how those goals will be reached.
- Every employee receives an employee handbook that contains all up-to-date personnel policies.
- Every employee has access to standard operating procedures for their operating unit.
- Every employee receives a copy of their job description and the organizational chart.
- Executive management meetings for director and unit managers will be held bi-weekly.
- Unit meetings will be held by managers weekly.
- All company meetings will be held quarterly.
- Managers will have face-to-face contact with employees in their department at least once a week.
- Meetings will be held to recognize major milestone and accomplishments.
- All employees receive yearly performance reviews, including their goals for the year, updated job descriptions, accomplishments, needs for improvement, and plans to help the employee accomplish the improvements.

Strategy and Methods

Chestnut Hill Tree Farm will disseminate information utilizing the organizational hierarchy.

1. Face to Face Communication in Organizational Unit Meetings

As appropriate, information and issues discussed in executive management meetings is cascaded though the organization starting with weekly staff meetings conducted by executive managers in their respective units. Directors and all other managers who have staff reports have responsibility for sharing/passing along information intended to be disseminated institution-wide in a timely manner. At the end of each executive bi-weekly management meeting, the Chief Executive Officer identifies the agenda items/information that should be communicated throughout the company and directors and managers are then responsible for initiating the information dissemination process.

2. Company Wide Meetings

The Chief Executive Officer will conduct an all company meeting quarterly or as is otherwise deemed necessary. These meetings are intended to convey timely information about organizational issues and/or give the Chief Executive Officer the opportunity to make a "state-of-the-company" address to employees.

Strategy and Methods

The company will disseminate information utilizing internal mass media.

1. Company Intranet

Chestnut Hill Tree Farm will develop and maintain an internal website for company communication. This intranet will assist in the maintenance and organization of company documents including handbooks, forms, operating manuals, and reference links. The purpose of the intranet is to inform employees of the company's business, policies, news, and events, and provide information that helps employees fulfill the company's vision, mission, core values, and strategic directions. Employees are responsible for logging into the intranet and reviewing new postings on a regular basis.

Oversight**:**
The intranet is managed by the Human Resources Manager and the Information Technology Manager.

Circulation:
The intranet is accessible only by employees with a valid login.

Frequency:
The intranet is accessible at any time by employees with a valid login. The content will be updated as frequently as needed. Every employee with a valid login will receive an email notice of updated material. Depending on the nature of the update, particularly for legal or compliance issues, the posting may require an acknowledgement from the employee that they have reviewed and understand the update.

Content:
Content is subject to editorial discretion in determining what is of interest to the company. Political, religious, or controversial topics are prohibited. All items are provided by managers and subject to editing for reasons of clarity and space. The intranet will provide current copies of all manuals, forms, training videos, and other documents needed for employees to perform their duties. Additionally, blog content will include:

- CEO Notes: provides information from the weekly executive leadership meeting and other news from the Chief Executive Officer.
- Operational Notes: provides information provided by operating units about their news, policy and procedure changes, services, deadlines, etc.
- Medical Cannabis Notes: provides information that educates employees about medical cannabis science, policy, or other issues surrounding medical cannabis.
- Technical Notes: provides employees with reminders or hints for the information technologies used in the company. For example, providing a short cut in the point of sales system.
- Personal Notes: offers personal news about employees or patients and their successes and achievements, both personally and professionally. Due to issues of privacy all information shared will be submitted or approved by the employee or patient.

Submission Instructions:
Content may be submitted via e-mail at any time to the Human Resources Manager. Submissions should include the contributor's name, department, e-mail or phone. Items will be attributed to the contributor unless other attribution is indicated. Publication cannot be guaranteed.

2. All Company E-Mail

The intranet is the preferred method of intercompany communication. Decision to send an all-company e-mail rather than publishing on the intranet is based on whether or not the information that needs to be disseminated is time-sensitive or needs focused attention. Employees who have information that is believed to require institution-wide dissemination and meets either criterion should contact their immediate supervisors to obtain approval for as well as facilitate the sending of an all-company e-mail message. Only managers may send all-company emails unless the email is in regards to an incident response issue in accordance with the company's incident response policies. A list of time-sensitive events includes but is not necessarily limited to the following:

- Deaths
- Inspection or visit notices
- Crisis communication and emergency closings
- IT notices about viruses or imminent problems
- Power/service outages or interruptions

- Public safety advisories
- Parking or construction issues
- Chief Executive Officer messages

3. Broadcast Voice Mail

The Chief Executive Officer has the authority and access to generate a voice mail message to all-users simultaneously. It is at the CEO's discretion as to when and under what circumstances this medium is used. Broadcast voice mail will be utilized for emergency and incident communications.

UPWARD COMMUNICATION

Chestnut Hill Tree Farm will take advantage of and create new opportunities for dialogue with employees and upward communication. The highly regulated structure of the company requires that employees feel comfortable bringing problems, issues, and concerns up the chain of authority. The company will implement the following upward communication methods:

- All employees give regular status reports to their supervisors. The informal email report includes a list of their activities in the past week, their plan for the following week, and a report of any actions, problems, or issues to address.
- All supervisors will meet one-on-one at least once a week with their employees to discuss current operations, acknowledge any concerns from the employee, etc.
- Executive management and staff meetings will provide opportunity to provide feedback. A round table approach to hear from each person will be utilized to solicit participation.
- All feedback will receive a management response, even if only to say no action will be taken on the reported problem or suggestion, etc. and the reason why.
- "Grapevine" communication is one of the most prevalent and reliable forms of communications and will not be discouraged unless it negatively impacts morale. Major "movements" in the organization usually first appear when employees feel it safe to venture their feelings or opinions to peers.

Strategy and Methods

Chestnut Hill Tree Farm will formalize institutional opportunities for dialogue and upward communication.

1. Review, Recommendation, Feedback/Consensus Process

While for legal and compliance reasons there are some decisions that will be made unilaterally by the executive management team, the company values decision-making at all levels and places an importance on involving affected employees in the decision-making process when possible and appropriate. The review, recommendation, feedback, consensus process for seeking company input is as follows:

- Policies, regulations, processes or issues that may have a company-wide impact are discussed as an agenda item at a regular meeting of the executive management team.
- An item is placed on the agenda by the Chief Executive Officer or at the request of another executive management team member.
- If the agenda item is determined to have a company-wide impact and broad-based company input is appropriate, the executive management team assigns it for review and recommendation to a group of managers selected by the CEO.
- The manager group will seek feedback from their operating unit's employees and make a recommendation to the executive management team.
- After the executive management team reviews the document or recommendation, either consensus is reached and the document or recommendation is approved or the document is returned to the manager group for further consideration.
- The cycle begins again until consensus is reached.

Employees may request that an item be placed on the executive management team meeting agenda. This request should be made to and carried forward by the immediate supervisor. Should a determination be made by the Chief Executive Officer that the issue will not be placed on the executive management team agenda, the supervisor will apprise the employee as to the rationale.

2. Communication Liaison

In an effort to ensure that every employee has the opportunity to bring ideas and issues of concern to the attention of the executive management team, each operating unit's manager will serve as communication liaisons between staff and the Chief Executive Officer. The communication liaison's primary responsibility is to bring ideas, issues and concerns to the CEO on behalf of individual employees.

While members of the executive management team maintain an open door policy and the communication liaison provides employee access to the CEO, employees with issues and concerns are encouraged first to pursue standard administrative channels.

3. Company Forums and Focus Groups

When there is detailed information about an issue that needs to be presented company-wide and requires the opportunity for questions and input, a forum format may be utilized. From time to time the company will seek input from employees about various aspects of the organization. Focus groups consisting of 5 to 10 employees are facilitated by company directors or an outside facilitator.

METHODS FOR ASSESSING AND MITIGATING ODOR IMPACTS

Each operating day the Facilities Manager or designee will evaluate on-site odors and operations for potential release of objectionable odors. Filters are used throughout the head house to prevent odor issues. However, if questionable or objectionable on-site odors are detected by staff or reported as a problem, the company will implement the following protocols:

- Investigate and determine the likely source of the odor.
- Access the effectiveness of available on-site management practices to resolve the odor event and immediately take steps to reduce the odor-generating capacity of on-site material.
- Determine if the odor traveled off-site by surveying the site perimeter and noting existing wind patterns.
- If it is determined possible odors impacts occurred, appropriate EA and/or neighbors contact is made.
- Record the event for further operational review.

METEOROLOGICAL CONDITIONS

The Chief Operating Officer will document historical data regarding wind velocity and direction taking into account seasonal shifts. This information will serve as a guideline for periods of heightened awareness or periods when more attentive order mitigation is required.

COMPLAINT RESPONSE PROTOCOL

All complaints received by the company will be categorized by a manager. Odor complaints will be directed to the Facilities Manager. The Facilities Manager or Chief Operating Officer will respond to any complainant relating to any odor issue within twenty-four hours. If the responding manager cannot fully resolve the issue, the Chief Executive Officer will be notified and determine the appropriate course of action. It is company policy to make a good faith effort to resolve any complaint, whether legitimate or frivolous whenever possible.

OPERATING PROCEDURES (AND DESIGN CONCERNS) TO MINIMIZE ODORS

In order to minimize the development of conditions that could lead to odor problems, the compostable material handling areas of the site will be designed based on the nature and quantity of materials to be received and stored, climatological factors, adjacent land use, grading, and drainage controls.

AIRBORNE EMISSION CONTROLS

In order to reduce airborne emissions of odors, the company will utilize standard carbon filters in the greenhouse facilities. Portable carbon scrubbers will also be used in the harvest and processing areas to reduce the temporary odors caused from those operations. Additionally, exhaust air will be treated with Ecosorb® natural organic odor neutralizer[8] during the flowering phase in the cultivation areas.

PAD AND FILTER MAINTENANCE

Regular pad and filter cleaning and maintenance is required by the company's maintenance policies and will decrease the accumulation of any odor causing build up.

[8] http://odormanagement.com/

3. PREMISES, RESOURCES, AND PERSONNEL

Part 3.B.3.a. Location of all properties Applicant proposes to utilize to process low-THC cannabis and Derivative Products, including ownership information for the properties and any lease terms if applicable

i. For any property that is leased by the Applicant, include documentation that the property owner consents to the use of the property for the purposes of processing of low-THC cannabis and documentation that the mortgagor or lienholder has been given notice of the use of the property for the purpose of cultivation of low-THC cannabis; and

ii. For any property owned by the Applicant but subject to a mortgage or lien, include documentation that the mortgagor or lienholder has been notified of the use of the property for the purpose of processing of low-THC cannabis.

The facility for processing Derivative Products is owned by the Applicant. Mortgagor approval is attached.

Fwd: Medical Marijuana license

Robert Wallace <chnuts@gmail.com> Mon, Jul 6, 2015 at 1:42 PM
To: Jill Lamoureux <jillklamoureux@gmail.com>

I just fixed
Bob

R.D. Wallace
Chestnut Hill
15105 NW 94 Ave
Alachua, FL 32615
352-219-5825

---------- Forwarded message ----------
From: Robert Wallace <chnuts@gmail.com>
Date: Mon, Jul 6, 2015 at 3:19 PM
Subject: Fwd: Medical Marijuana license
To: Jill Lamoureux <jillklamoureux@gmail.com>

Bob

R.D. Wallace
Chestnut Hill
15105 NW 94 Ave
Alachua, FL 32615
352-219-5825

---------- Forwarded message ----------
From: Mark Wellner <mwellner@floridacitizensbank.com>
Date: Tue, Feb 24, 2015 at 11:01 AM
Subject: Re: Medical Marijuana license
To: Robert Wallace <chnuts@gmail.com>

Bob,

We don't have a problem maintaining the LOC as is with Chestnut Hill Tree Farm.

Good luck with your application.

Let me know when you hear the answer.

Mark Wellner
Vice President
Senior Credit Officer
Florida Citizens Bank
3919 West Newberry Road
Gainesville, FL 32607
NMLS: 689202
Phone: 352-333-6547
Fax : 352-378-1836

Part 3.B.3.b. Compliance with local regulations regarding sanitation and waste disposal

Chestnut Hill Tree Farm's waste management policies detail the operational procedures for cannabis waste disposal. The Cultivation Director, in collaboration with the Chief Operating Officer and Facilities Manager, is assigned responsibility for enforcing policies and procedures relating to cannabis waste management in the cultivation unit. Pursuant to Section 64-4.002 Part (c), all waste, including waste composed of or containing finished cannabis and cannabis products, will be stored, secured, and managed in accordance with applicable state and local statutes, ordinances, and regulations. The company's waste disposal procedures are detailed in the Standard Operating Procedures which are included as an Appendices to the application.

All disposed waste will be recorded in the waste disposal log with details pertaining to the date of disposal, type and quantity of waste disposed of, manner of disposal, and the name of the patient who supplied the waste if applicable. Additional waste disposal provisions include detailed plans for excess product disposal, liquid and solid waste disposal based on guidelines from environmental agencies, composting practices, and the disposal of expired, contaminated, or otherwise unusable cannabis products.

All managers are responsible for ensuring the quality and safety of cannabis products in their inventory on a daily basis. Each operational unit must ensure that expired, contaminated, or otherwise unusable cannabis products are returned to the cultivation facility for disposal in accordance with the company's waste management policies and properly recorded in the inventory management or point of sale systems.

As the company shall produce oil extractions only, production will be utilized as much viable cannabis as possible, reducing excess medical cannabis waste from operations. The company's current waste management plan operates with three streams of waste: compost, laboratory waste, and medical waste. Laboratory waste consists of chemical waste, sanitizers, solvents, and any other waste from extraction operations. Medical waste shall consist of any finished Derivative product that has been deemed as waste by an appropriate supervisor, and will be then be hauled by the same hazardous waste company that will also dispose of all laboratory waste. All waste from dispensary operations will be transported to the cultivation facility in compliance to local and State laws and regulations, Federal Laws, and company policy. The company has found a compliant waste management organization that specializes in the disposal of hazardous waste. The local ordinances that address solid and liquid waste are discussed in this section. The company's proposed waste management polices do not conflict with local ordinances in anyway, however, should they in the future, the company will adapt all policies and procedures to comply. The company's protocols for waste management are further addressed within the odor mitigation and cultivation plans.

Pursuant to Alachua County's regulations regarding wastewater, the minimal, if any, disposal of wastewater shall be accomplished by environmentally sound procedures consistent with Florida Department of Environmental Protection regulations and Article XII Section 406.70. The company shall adhere to all local wastewater disposal standards and record and maintain all necessary information regarding wastewater in the waste disposal log. Unlike hydroponic systems, the company's soil base media does not result in any liquid waste runoff. Local ordinances, which are not applicable to the company at this time due to company's operational procedures, include:

- Section 406.70 Part (b) – Discharges to surface waters and wetlands
- Section 406.70 (d) – Spray irrigation

In accordance with Article II, Section 75.303 of Alachua County's local ordinances, the company will comply with the country's preferred methods of waste disposal, recordkeeping requirements, and all Federal, State, and local laws for all types of waste produced during cultivation operations. The company has found an established and authorized waste management company that can properly dispose of all of the company's processing and

laboratory waste [website found at: http://www.hazardouswasteexperts.com]. Pursuant to company policy and industry best practices, all cultivation department waste will be stored and disposed of in a manner that:

- Minimizes the development of odors;
- Minimizes the potential for waste to attract, harbor, or become a breeding place for pests;
- Protects against contamination of cannabis, contact surfaces, water supplies, and grounds surrounding the facility;
- Controls hazardous waste to prevent contamination of cannabis, contact surfaces, water supplies, and grounds surrounding the facility;
- Prevents diversion, theft, or loss of unusable cannabis product;
- Provides traceability through documentation, reporting, and electronic tracking.

The company has decided to dispose of cannabis waste through grinding and composting techniques that are compliant to all local, State, and Federal laws and regulations. The company's cultivation facility's composting of solid cannabis waste, the cultivation facility shall essentially produce zero solid waste. Prior to commencing the following disposal process, the appropriate cultivation manager will assure that all pre-disposal reporting and recordkeeping requirements are satisfied. A trained cultivation employee, under management supervision, will render solid cannabis waste unusable by grinding and incorporating cannabis waste with other locally approved ground materials. Cannabis plant waste will be ground with either compostable mixed waste, which includes food waste, yard waste, vegetable based grease or oils, or other Florida Department of Environmental Protection–approved compostable waste materials.

Per Article II of Alachua County's regulations, the company shall properly dispose of all solid waste in accordance to the county's policies. In accordance with Section 75.302, the company shall comply with all collection service and recycling requirements for the establishment. All facility department waste will be collected and disposed of such that:

- The facility shall provide for the "source-separation" of the designated recyclable materials from its solid waste.
- The company will provide for the source-separation of any metals and packaging materials.
- The company shall provide for the proper recycling of such recyclable material at a materials processing facility either by entering into an agreement with a permit holder or certified recycler, or by other lawful means.
- The facility manager shall ensure that all recovered materials shall be placed in a recycling container to minimize contaminating the recovered materials with solid waste so that no more than twenty-five percent of the weight or volume in the recycling container is solid waste.
- The company has established a recycling program that is convenient and accessible to all employees for recycling of designated recyclable materials.
- The facility manager will ensure all recycling containers in a safe, accessible location. The facility manager will be responsible for the proper maintenance for all recycling containers

Part 3.B.3.c. The ability to obtain zoning approval

Chestnut Hill Tree Farm resides in Alachua County. The County has determined that cultivation, processing, and dispensing are allowed uses in the County as evidenced by this memo issued April 2015.

ALACHUA COUNTY
DEPARTMENT OF GROWTH MANAGEMENT
OFFICE OF PLANNING AND DEVELOPMENT

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Building Official

Benny Beckham
Zoning Administrator

March 5, 2015

MEMORANDUM

To: James Harriott, Asst. County Manager

From: Steve Lachnicht, Director: Department of Growth Management

Re: Siting of Marijuana-Related Businesses in Alachua County

At the direction of the Board, County staff reviewed the Land Development Code to determine how marijuana-related businesses would be sited in Alachua County. Staff's analysis is based on the statute and currently proposed rule, both of which are subject to change in the next few months. As staff understands marijuana-related businesses, these businesses will have three functions: 1) cultivating the marijuana plants, 2) processing the marijuana plants; and 3) dispensing the marijuana product. Under the County's Code, these are agricultural, industrial, and commercial uses, respectively. These functions of the marijuana-related businesses would be allowed in their respective districts under the Land Development Code. The proposed state rules for these businesses are very detailed and appear to address any potential local concerns. Therefore, with the currently proposed rules, there does not appear to be a need for additional local zoning regulations.

The current draft of the proposed rules allows cultivating, processing, and dispensing to occur at one or more locations. Under the County Code, for example, the plants could be grown in a rural/agricultural district, processed in an industrial district, and dispensed in a commercial district. Based on staff's understanding of the process associated with cultivating, processing, and dispensing low THC marijuana, a marijuana-related business could be structured in multiple configurations, ranging from all three functions on a single site to each function on a separate site. Alachua County's Code would allow each of these configurations within proper zoning districts.

Under the current language of the proposed rules, applicants to the State for authorization to operate a marijuana-based business must demonstrate their ability to obtain zoning approval from the local government. Due to the ongoing rulemaking process, staff anticipates that it will be at least a month, likely longer, before a marijuana-related business will be operating within the County.

Part 3.B.3.d. Sketch or other illustration approximating the property boundaries, land topography, vegetation, proposed and/or existing structures, easements, wells, and roadways for each processing property proposed

The Chestnut Hill Tree Farm is located at 15105 NW 94th Ave., Alachua, Florida 32615. The site plan illustrates the existing site and details the proposed structures. Processing activities including analytical testing, grinding, extraction, manufacturing, and packaging and labeling. The head house structure will house the processing activities in approximately 2,000 sq. ft. of dedicated space. In order to meet cGMP standards, these operations will take place in separate areas:

- Drying and storage (extraction prep) 1023 sq. ft.
- Walk-in refrigeration and storage 193 sq. ft.
- Extraction and packaging 309 sq. ft.
- Clean lab 238 sq. ft.
- Scrub room 122 sq. ft.
- Secure storage sq. ft.

The manufacturing facilities feature:

- Analytical testing facilities equipped with several instruments
- CO_2 extraction and cannabinoid fractionating equipment
- Multiple production areas designed to FDA standards
- State-of-the-art ventilation systems to avoid cross contamination

SUITABILITY

The company will construct the manufacturing facilities to achieve the most efficient and hygienic operations possible. Employees will perform cultivation, manufacturing, packaging, testing, and other operations in separate designated areas. The Chief Executive Officer will ensure all buildings and facilities used in the manufacture, processing, packing, holding, or dispensing of medical cannabis products are of suitable size, construction, and location to permit compliance with applicable state and local regulations.

The company will completely equip all manufacturing and laboratory spaces and approximately one third of its full capacity for vegetative and flowering cultivation spaces. These spaces will be outfitted with the necessary equipment and supplies to begin cultivating cannabis immediately upon the issuance of a certificate of occupancy. The remaining cultivation areas will be “plug and play” so that production can be rapidly expanded in order to both meet immediate patient demand and to provide sufficient production in order to maintain the one year supply of products required by regulation. This phased approach ensures that all demolition and construction activity is completed prior to the start of operations and before medical cannabis plants enter the facility.

All cultivation and manufacturing areas will be finished during initial construction and equipped with all branch utility services, including mechanical, plumbing, lighting, and other power connections, as well as all security, surveillance, and access control devices. All buildings and facilities will be consistently maintained in a good state of repair through the efforts of the facilities management team. FDA and industry best practice will be adhered to in the manufacturing facility, these standards include the following requirements:

- All areas will have adequate lighting and ventilation in all areas for their designated operations.
- Potable water will be supplied under continuous positive pressure in a plumbing system free of defects that meet the standards prescribed in the Environmental Protection Agency's Primary Drinking Water Regulations.

- Drains will be of adequate size and, where connected directly to a sewer, will be designed to prevent back-siphonage.
- Adequate washing facilities will be provided, including hot and cold water, soap, or detergent, air driers, single-service towels and clean toilet facilities easily accessible to working areas.
- All trash or other refuse in and from the building and immediate premises will be disposed of in a timely, safe and sanitary manner.
- All buildings and facilities will be maintained in a clean sanitary condition, free of infestation by rodents, birds, insects and other vermin.
- Each operational unit will maintain SOPs assigning responsibility and timing for the cleaning and sanitation.
- Any rodenticides, insecticides, fungicides, fumigating agents and sanitizing agents will be documented and used in accordance with the Federal Insecticide, Fungicide and Rodenticide Act.

DESCRIPTION OF THE FACILITIES

The proposed manufacturing facility is an enclosed, secure facility, is suitable for the effective and safe cultivation, processing, and manufacture of medical cannabis. The building and proposed construction plan ensures the facility is sufficient in size to meet patient needs. Adequate power and water supply permits the operation to begin processing operations without costly and timely utilities upgrades. The processing areas have been designed with operation-specific air exchange and airflow, interior layout, lighting, and utilities.

The proposed facility will be constructed and operated in full compliance with the Florida Department of Health's Office of Compassionate Use and Section 381.986 of the Florida Statutes. The facility is located at 14810 NW 94 Ave., Alachua, FL 32615, which is appropriately zoned for the manufacturing use. The property is in compliance with all state and local building, zoning and fire codes, and all local ordinances as it is an existing building currently operational as an agricultural production facility. For site and floor plans and additional information regarding the uses adjacent to the proposed facility, including private roads within the facility, roads accessible by the facility, and all production, receiving, and shipping areas within the facility, please refer to the included site plans.

The company designed the facility with the advice of consultants qualified in the cannabis industry to develop efficient and workable spaces. In order to meet initial and future qualifying patient demand in a quick and efficient manner with minimal impact on the environment and the surrounding community, the company will build out all cultivation spaces during the initial construction phase. The construction plan allow not only for quick expansion of production, but also allows for well-planned production schedules, the separation of similar strains, and allows for strict environmental controls in each area to allow for variable temperature, humidity, and carbon dioxide based on individual strain requirements. The ability to control these conditions with precision is one of the most important measures that can be taken to reduce contamination from pests, molds, and mildew.

DESIGN

The manufacturing facility was developed with compliance and efficiency as the guiding design features. FDA standards were applied throughout the facility. The following items highlight specific design characteristics:

- The manufacturing facility will be organized to maintain the separation of different materials and provide adequate space for cleaning and storage.
- The flow of production materials, packaging components, in-process materials, bulk and packaged products through the building will be designed to prevent product mix ups or contamination.

The design of the facilities includes but is not limited to airlock entry and exit hallways, clean rooms, and strict flow controls for personnel and materials. The facility is also designed so that preventative maintenance activities can be performed without interruption to work process or impact clean production areas. Equipment for adequate control of air temperature, pressure, humidity, dust, or microorganisms will be provided when appropriate for the manufacture, processing, packing, or holding of medical cannabis products. Air filtration systems will be used for air intake to production areas. If air is recirculated to production areas, measures will be taken to control the recirculation of dust. In areas where air contamination occurs during production, there will be adequate exhaust or other air handling systems to control any airborne contaminants.

The manufacturing facility will feature separate and defined areas with specific environmental controls designed to prevent cross-contamination and mix-ups of components, cannabis, or finished products during any operation. The facility building, its parking lot, and its entrances are designed to be in full compliance with all building and zoning codes.

OPERATING AREAS

The production and manufacturing operations are divided into distinct operating units that specialize in certain activities in order to maintain an effective division of duties. These units include:

- Cultivation
- Processing (Trim and Cure)
- Extraction
- Manufacturing
- Packaging and Labeling
- Lab Testing
- Quarantine and Holding
- Transportation Staging

Different operations will be performed within specifically defined areas of adequate size for that activity. Separate and defined areas provide controls to help prevent product contamination and mix-ups during the course of the operations. Separate areas are required for the following tasks:

- Receipt, identification, storage and quarantine of production materials, manufacturing supplies, packaging components and labeling held for the appropriate sampling, testing, or examination
- Storage of released production materials, manufacturing supplies, packaging components and labeling
- Manufacturing and processing operations
- Storage of in-process materials
- Packaging and labeling operations
- Quarantine storage of packaged products before release
- Storage of finished products after release
- Quality assurance and laboratory operations
- Holding rejected production materials, manufacturing supplies, packaging components, labeling, in-process materials and product before disposition
- Product packaging, holding, and shipping

ENVIRONMENTAL CONTROLS AND SANITATION

Areas of the manufacturing facility designated for extraction operations will be of suitable size, design, and construction for safe production operations. Employees are required to take any precaution necessary to maintain

the security of facility, to prevent unauthorized access to controlled access areas, and to maintain strict control of all cannabis in storage and while cannabis products are in-process.

The Quality Assurance Officer shall not permit any operation in that is unlawful or unsafe. All operations will be designed in such a way as to have sufficient space that enables both safe and orderly processes and prevents constituent mix-ups. All extraction and production areas must be well maintained.

The designated Extraction Technician must observe operation areas daily and inform the Quality Assurance Officer of any repairs necessary to maintain sanitary conditions. If a condition exists that prohibits the safe and sanitary production of cannabis products, the Quality Assurance Officer may suspend manufacturing operations until resolved. The Quality Assurance Officer shall develop protocols concerning daily cleaning and sanitizing of equipment, containers, and other surfaces that comes into contact with cannabis operations. The company shall also control any possibility of airborne contamination through ventilation systems and enforcing employee hygiene and health protocols.

To ensure purity, each employee must adhere to the hygiene and sanitation protocols outlined by the Quality Assurance Officer. Employees will be required to wear all laboratory protective clothing during any activity that exposes employees to any product, hazardous material, and sanitized workspaces. The company will supply all employees with laboratory uniforms, including protective lab coats, gloves, hairnets, facial hairnets, safety goggles, and shoe covers. Uniforms will be designed for durability, sanitation, and shielding defense.

The Quality Assurance Officer will perform chemical, microbiological, or other testing, as often as necessary to prevent the production of contaminated products. Protocols include the sterilizing, pasteurizing, freezing, refrigerating, heating, pressurizing, controlling hydrogen-ion concentration (pH), controlling humidity, controlling water activity (aw), or using any other effective means to remove, destroy, or prevent the growth of microorganisms and prevent decomposition. All constituents, in-process materials, and cannabis products shall be stored appropriately to prevent contamination and adulteration.

PREVENTATIVE MAINTENANCE

Facility areas designated for extraction and manufacturing operations will be of suitable size, design, and construction for safe production operations. The Extraction Manager shall not permit any operation in the OCU that is unsafe or unsuitable. Operations will be designed in such a way as to have sufficient space that enables both safe and orderly processes and prevents constituent mix-ups. All extraction and production areas must be well maintained. The Extraction Manager must observe operation areas daily and cause any repairs necessary to maintain sanitary conditions to be performed as soon as possible. If a condition exists that prohibits the safe and sanitary production of cannabis products, the Director, in his or her discretion, may suspend manufacturing operations until resolved.

CHESTNUT HILL TREE FARM NURSERY AND EXTRACTION LAB

15105 NW 94TH AVENUE ALACHUA, FL 32615

INDEX OF DRAWINGS

GENERAL
G010 COVER SHEET

CIVIL

LIFE SAFETY

ARCHITECTURAL
A100 SITE PLAN
A101 GROUND FLOOR PLAN
A102 GROUND FLOOR SECURITY PLAN

STRUCTURAL

MECHANICAL

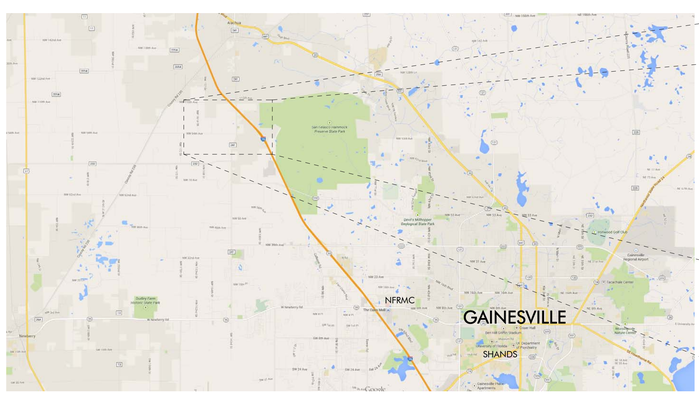
PLUMBING

FIRE PROTECTION

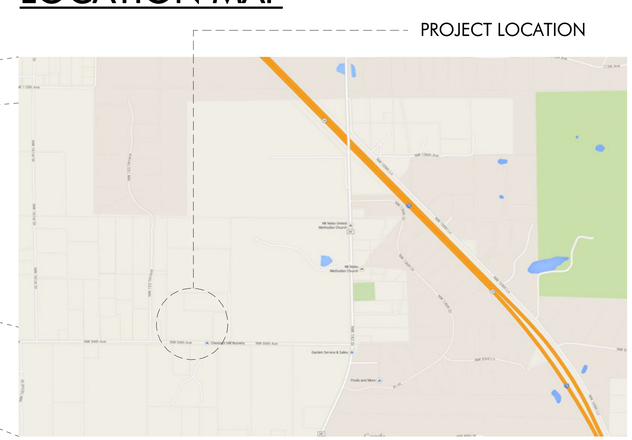
ELECTRICAL

TELECOM

PROJECT VICINITY



LOCATION MAP



PROJECT INFO.

BUILDING INFORMATION & LIMITATIONS

BUILDING OCCUPANCY CLASS:	XX (X)
CONSTRUCTION TYPE:	TYPE X X
SPRINKLERED:	Y/N
ALLOWABLE BUILDING HEIGHT:	x STORIES (X')
ALLOWABLE BUILDING AREA (PER STORY):	X,XXX GSF*

AREAS & OCCUPANT LOAD CALCULATIONS

TOTAL GROSS FLOOR AREA:	X,XXX GSF
NET FLOOR AREA:	X,XXX NSF
TOTAL OCCUPANT LOAD:	XXX OCCUPANTS

CONSULTANT:

CHESTNUT HILL TREE FARM
15105 NW 94TH AVENUE ALACHUA, FL 32615

CONCEPT

PROJECT NO.: XXXXXX

DRAWN BY: Author

ISSUE DATE: XX/XX/XXXX

REVISION SCHEDULE

REVISION NO.	REVISION DATE

SHEET TITLE: COVER SHEET

SHEET NO.: G010

CONSULTANT:

CHESTNUT HILL TREE FARM

15105 NW 94TH AVENUE ALACHUA, FL 32615

CONCEPT

PROJECT NO.:
XXXXXX

DRAWN BY:
XXX

ISSUE DATE:
XX/XX/XXXX

REVISION SCHEDULE	
REVISION NO.	REVISION DATE

SHEET TITLE:
SITE PLAN

SHEET NO.:
A100

Part 3.B.3.e. A description of the ability or plan to expand any of the areas proposed for processing low-THC cannabis

Chestnut Hill Tree Farm has dedicated over 2,000 sq. ft. of its head house to processing activities. This allocation of space allows for the company to adequately process its projected harvests. The company will have excess capacity for production of Derivative Products within the projected period of five years. Should demand outpace production before anticipated, the company can simply add a second shift of employees and double output. Should the demand change dramatically, the company has sufficient land to construct additional facilities within a two to three month window.

Chestnut Hill Tree Farm anticipates that the facilities developed for the current legislation is more than sufficient to meet demand for several years. However, should demand exceed production capacity addition land is available for additional greenhouses or secured outdoor crops. In the event an expansion is needed an additional head house will be constructed. All cultivation and trimming operations will be relocated the new facility and processing will expand throughout the entire existing head house.

All processing areas will be finished during initial construction and equipped with all branch utility services, including mechanical, plumbing, lighting, and other power connections, as well as all security infrastructure and access control devices. The company will completely equip all processing areas.

BIOTRACKTHC

BioTrackTHC enables the business to collect, store, and retrieve all data and activity - with respect to inventory records, inventory-tracking records, supplier records, patient records, client-records, employee records, recall reports, quarantine and waste reporting, sales/transaction records, disposal records, and all scanned documents -- at any time (real time), either in-system or through the report creation tool. Though system actions can be adjusted or voided, at no time is any data ever fully deleted as BioTrackTHC maintains a log of every action, including adjustments and voids, so that the entire history of the system may be reconstructed. The availability and report ability of the system data enables the said entity to produce any information necessary for the OCU during an inspection or at their request.

INTERNAL PROTOCOLS

Chestnut Hill Tree Farm has pre-developed emergency management procedures for implementation if licensed. The organization plans to manage risk throughout its operations to ensure consistent supplies for patients even in times of emergency. The company will focus on the following risk management strategies:

- Inventory planning;
- Cross training and insurance for key personnel;
- Retention of consultants and industry experts; and
- Providing emergencies utilities required for minimal operations.

INVENTORY PLANNING

Based on the company's observation and analysis of the growth rates of medical cannabis programs in similar states including Arizona, Connecticut, Massachusetts, and Illinois, we expect a slow ramp-up of Florida medical cannabis patients. The facility's capacity for production will allow for overproduction in the first few years of operation. This over supply will allow the company to warehouse excess finished products for distribution in case of an operational shut down for any reason. A first in, first out inventory method will be used to for all product inventory. The target inventory of the operation will be set at one year's projected inventory of all finished products. This inventory will be highly secured and anti-diversion protocols will be implemented throughout its lifecycle.

KEY PERSONNEL

The company's staffing plan contemplates cross training for all key personnel. This integrated organizational structure allows the maintenance of the company's high operating standards even when key personnel are absent. Each operating unit will always ensure that a minimum of two staff members are capable of managing the highest functions of the unit.

Additionally, the company will carry key employee insurance for the head of each operating unit. This precaution will cover the cost of replacing an integral team member in case of an unexpected disability or death. The policy will allow the company to immediately bring in consultants and industry experts to help manage and recruit and train a replacement so that no operational interruptions occur.

RETENTION OF EXPERTS

Multiple industry experts have already been retained by the company as advisors for the planning and application process. These experts will remain engaged with the company during start-up operations. They provide professional

back-up options for all processing functions in the organization. These advisors have allocated time to assisting the company and will be available in any emergency scenario to provide operational functionality until normal operations are restored. As these experts designed the company's operating model, they are the best solution during stressed operating periods.

Green Standard Diagnostic (GSD) will provide quality assurance and processing oversight. The team of scientists led by Jahan Marcu, PhD will be responsible for training all processing staff and will be available to provide operational services in the event that regular staff is unavailable to fulfill processing tasks.

UTILITIES REDUNDANCY

The company will employ the use of a generator with sufficient power to operate all critical equipment during an emergency situation. The greenhouse does not require emergency lighting as natural light will be sufficient to maintain plant health, but the facility does require emergency power to operate shade and black out curtains and the environmental control systems. A generator will be used to provide sufficient power to critical systems for a least one week. The company's back stock will allow the operation to safely shut down operations if needed during a hurricane evacuation.

Part 3.B.3.g. Description of the areas proposed for the processing of Derivative Products

Including the following: i. Extraction equipment and location; ii. Concentration equipment and location; iii. Access to sufficient potable water and hot water; iv. Analytical equipment, including separators and detectors, and location; v. Safety equipment and facilities and location; vi. Computer systems and software; and vii. Ventilation and exhaust system

Processing operations will require the following major equipment identified on the floorplan:

Extraction/Packaging
Air curtains
Aluminum foil strip packaging machine
Capsule Filling Machine
Chemical spill cabinet
Commercial grinder
Flame proof storage cabinet
Piston Filler (bench top)
Supercritical Fluid Chromatography
Supercritical Fluid Extractor
Tablet press
Type II fume hood

Laboratory
Air curtains
Auto-pipet (bench top)
Centrifuge (bench top)
Desiccator (bench top)
Dishwasher
Drying oven (bench top)
Ducted chemical fume hood
Fluorimeter (bench top)
Freezer
GC/FID (bench top)
GC/MS (bench top)
UPLC/MS/MS (bench top)
Incubator (bench top)
IPC/MS (bench top)
Laminar flow hood
Locking medical refrigerator
MARS extractor - microwave digestion (bench top)
Milli-Q water system (bench top)
qPCR-realtime polymerase chain reaction (bench top)
R&D grinder (bench top)
Rotary evaporator (bench top)
Sonicator (bench top)
SPE manifold (bench top)

Safety Equipment (not shown)
Fire extinguisher (each door)
Multiple gas detector (each room)
Eye wash station (each room)
First aid kit (each room)

[redacted]

Part 3.B.3.h. A list of current and proposed staffing

Including: i. Position, duties and responsibilities; ii. Resume; and iii. Professional licensure disciplinary action in all jurisdictions.

STAFFING PLAN

The company's staffing protocols detail the processes the Chief Executive Officer and Chief Operating Officer will use to manage the company's human resources to provide customer accessibility and cultivation operations in compliance with state law and OCU regulations. The Chief Operating Officer is assigned the responsibility for maintaining and updating the staffing policies, which will ensure that the company has sufficient staff possessing the correct skill-sets and experience needed to ensure the success of all operations. The staffing plan will be updated at least annually.

The Manufacturing Director reports to Chief Operating Officer. The Manufacturing Director is responsible for supervision of all phases of manufacturing operations including: regulatory compliance to Florida medical cannabis state law regarding production, quality control, maintenance, receiving, and shipping. Responsibilities also include recruiting, hiring, and training manufacturing personnel. In addition to routine testing of all lots, the Manufacturing Director will randomly select products and send them to the external testing facility.

In addition, the Manufacturing Director will be responsible for annual budget planning and execution. This team member will work closely with the production team to oversee cGMP increase productivity and profitability within the manufacturing operation. This person will be trained and have at least seven years of experience, including best practices in both managerial and production platforms.

The Manufacturing and Extraction Managers report to the Manufacturing Director. Technicians will oversee all phases of manufacturing, packaging, and labeling, and will support the Quality Assurance team. The Manufacturing and Extraction Managers will plan, organize, and control production to ensure cGMP and that goods are produced efficiently, on time, within budget, and to standard. Technicians will provide support to the manufacturing process and report directly to the Managers. These team members provide extraction, manufacturing, packaging and labeling functions and are responsible for weighing, counting, ensuring accurate labeling, and packaging of all products of medical cannabis.

The Quality Assurance Officer is responsible for ensuring that all medical cannabis products meet the standards of quality including reliability, usability, safety, packaging, labeling, and performance. This position has the responsibility to assist the Cultivation Director and the Manufacturing Director.

Currently the operation has selected the following staff members:

- Chief Executive Officer – Robert Wallace
- Chief Operating Officer – Susan Baumgartner
- Chief Financial Officer – Deborah Gaw
- Cultivation Director – Codi Coleman
- Information Technology Manager – R. Dunstan Wallace
- Inventory Manager – R. Dunstan Wallace
- Medical Director – Dr. Richard Tempel
- Security Director – John Powell

Advisors engaged for services post-licensing include:

- Cannabis medicine - Margaret Gedde, MD. PhD

- Compliance and operations - Jill Lamoureux
- Extraction - Shannon Wilson
- Healthcare - Donn Dennis, MD
- Healthcare - Mark Rice, MD
- Quality Assurance - Jahan Marcu, PhD
- R&D – Citiva & Josh Stanley

The following cultivation positions will be filled upon licensing:
- Quality Assurance Officer
- Compliance Officer
- Human Resources Manager
- Cultivation Manager
- Cultivation Technicians
- Harvest Technicians

ADVISORY ROLES

The company has engaged a team of advisor to assist the transition to the new medical cannabis line of business. These advisors provide the company the opportunity to access expert advice that would not be available for hire. The advisors who will be in close contact with products will also be contract employees of the company, defined as employees for legal purposes. Those who simply provide operational advice and guidance will receive stipends for participation in regular meetings of the strategic advisory board and will be compensated for any additional time providing specific advice. The advisory board will help set the strategic goals for the company, while assisting with day-to-day start-up and business development in the beginning stages of the operation. These advisory will help the company avoid critical errors that could prevent medical cannabis supplies from getting to patients who have been waiting for a great deal of time for the program to become functional.

Advisory Board
The strategic advisory board, if utilized to its maximum potential, will serve as an asset to the company, its stakeholders, and community. Strategic advisory board members provide resources that help create sustainability within the company by serving in the following capacities:
- Providing guidance and mentorship
- Networking with other business leaders
- Recommending and overseeing projects
- Providing access to needed resources
- Serving as back-up for existing job functions

Despite the many benefits, the strategic advisory board provides three main benefits to the company:
- Sustainability of the team – the board provides continuity to the company over the long term. The board also provides credibility to the company, making it easier to build stable partnerships and obtain funding.
- Expertise and advice – board members bring a wide range of backgrounds and real-world experience to the table which can be applied to situations faced by the company.
- Resources – In addition to their expertise and advice, board members can provide a wealth of other resources. Such resources include networking contacts, sponsorship, employment/volunteer experiences, access to facilities or equipment, and more.

Strategic advisory board members are key individuals who provide insight on operations and are a vital part of the success of the company. Strategic advisory board members are selected by the company's executive team and may include:

- Community leaders from business, educational, and civic organizations.
- Cannabis and healthcare industry experts and advocates.
- Active members from organizations such as the Chamber of Commerce, Rotary Club and Economic Development Groups.
- Local businesses with common stakeholders.
- Members of financial institutions or investment companies.

Currently, the advisory board serves three year terms for continuity in the beginning stages of the business and is scheduled to meet four times per year. The end of year meeting will be used to set goals and provide planning for the upcoming year.

The Chief Executive Officer will appoint a strategic advisory board coordinator to manage the communications and activities of the members. Required board activities include:

- Annual on-site meeting
- Quarterly teleconferences
- Review calls as needed

PROCESSING JOB DESCRIPTIONS

QUALITY ASSURANCE OFFICER

Reports to: Independent Position

Job Description: The Quality Assurance Officer is responsible for the assurance of quality products by establishing and enforcing standard operating procedures that are in compliance with law, regulations, and company standards.

Job Responsibilities: Develops policies and procedures for testing materials and product. Responsible for the entire laboratory and the implementation and maintenance of the quality control and assurance program. The Quality Assurance Officer shall certify that personnel with appropriate educational and/or technical background shall perform all tests for which the laboratory is tasked, accredited, certified, and/or licensed. Supervises employees through coaching, counseling, planning, monitoring, and evaluating job performance. Serve as a training resource for all company employees.

Core Job Duties
Employee Support and Management:

- Responsible for assisting all unit managers with quality control activities.
- Responds to all employee questions, concerns, or suggestions and takes action when necessary to resolve quality issues.
- Coordinates with the executive management team to ensure accurate quality control and assurance information is communicated to the staff.

Quality Assurance Program Management:

- Establishes quality and reliability standards in accordance with best practice and all other applicable regulatory agencies.
- Establishes standards for the disposition of finished product by devising evaluation tests, methods, and procedures.
- Communicate product and consumer requirements with other members of the management and administration team.
- Establishes raw material standards by studying manufacturing and engineering requirements; conferring and negotiating with suppliers; devising testing methods and procedures.
- Completes quality assurance operational requirements by scheduling and assigning tasks and following up on work results.

Laboratory Management:

- The Quality Assurance Officer is ultimately responsible for the entire laboratory and the implementation and maintenance of the quality assurance program.
- The Director shall certify that personnel with appropriate educational and/or technical background shall perform all tests for which the laboratory is tasked, accredited, certified, and/or licensed. Such information shall be documented.
- Responsible for the health and safety of laboratory personnel.
- Responsible to ensure that all recognizable hazards are promptly addressed.

Reporting and Documentation:

- Prepares product and process quality reports by collecting, analyzing, and summarizing information and trends.

- Achieves financial objectives by preparing the quality assurance budget, scheduling expenditures, analyzing variances, and initiating corrective actions.
- Maintains professional and technical knowledge by attending educational workshops, reviewing professional publications, and establishing personal networks.
- Develop monthly reports for the Chief Operating Officer regarding all quality assurance issues including resolutions.
- Oversees the maintenance of accurate records of all quality assurance activities including training records, testing records, production records, complaint investigation, recall activities, materials receipt, returns, etc. in accordance with regulations and standards set by the company.

Qualifications:

- Must be a team player working across functions.
- Ability to communicate frequently and effectively with management and staff.
- At least three years professional experience required. Experience in food or manufacturing industries is preferred. Masters of Science degree in Chemistry, Microbiology, or similar field required.
- Demonstrated knowledge of regulatory requirements including Florida food handling laws, OSHA regulations, and FDA guidelines for food plant operations.
- Experience with Hazard Analysis and Critical Control Point (HACCP) evaluation of risk management.
- Ability to develop new products to meet market demands.
- Strong time management, record keeping, analytical and problem solving skills.
- Proficient in the use of computer software such as Microsoft Word and Excel and able to learn other software.
- Must be sufficiently proficient in English to read and interpret documents such as safety and security rules, operating and maintenance instructions, procedure manuals, etc. and write routine reports.
- Must be able to stand and walk on hard surfaces, be able to work in a hot and/or humid environment, be able to lift 25 pounds.
- Must pass a Level 2 background check.

MANUFACTURING DIRECTOR

Reports to: Chief Operating Officer

Job Description: Plan and execute cannabis products production from grinding to packaging. Follow all regulatory requirements for production. Produce safe medical cannabis products securely, efficiently, and effectively.

Job Responsibilities: Specify all inputs and production plans for cannabis product productions. Oversee purchasing of necessary inputs. Schedule production for efficient use of labor, equipment and materials. Monitor quality and consistency of products ensuring specifications are maintained. Ensure all food safety, personnel safety and security requirements are met. Manage two managers to ensure their performance is safe and effective.

Core Job Duties
Support and Management:

- Responsible for directing the Extraction and Production Managers. Serves in the manager role when necessary.
- Responds to all employee questions, concerns, or suggestions and takes action when necessary to resolve conflicts.
- Coordinates with the executive management team to ensure accurate information is communicated to the cultivation staff.

Processing Operation Management:

- Oversees all processing tasks and processes, ensures proper documentation of all applicable activities in accordance with regulations and standards set by the company.
- Oversees product development by ensuring the proper tasks are executed and sanitation levels are maintain to maintain superior product quality.
- Oversees procurement to ensure efficient levels of all processing inputs and supplies.

Reports and Documentation:

- Oversees the maintenance of accurate records of all processing activities including employee records, inventory records, production records, materials receipt, returns, etc. in accordance with regulations and standards set by the company.

Qualifications:

- Must be a team player working across functions.
- Ability to communicate frequently and effectively with management and staff.
- BS degree in food sciences and five years of experience with commercial food preparation. Industry experience may be considered in place of a degree.
- Must be a certified food service sanitation manager or be certified prior to starting.
- Effective personnel manager.
- Demonstrated knowledge of regulatory requirements including Florida food handling laws, OSHA regulations, and FDA guidelines for food plant operations.
- Experience with Hazard Analysis and Critical Control Point (HACCP) evaluation of risk management.
- Ability to develop new products to meet market demands.
- Strong time management, record keeping, analytical and problem solving skills.
- Proficient in the use of computer software such as Microsoft Word and Excel and able to learn other software.
- Must be sufficiently proficient in English to read and interpret documents such as safety and security rules, operating and maintenance instructions, procedure manuals, etc. and write routine reports.

- Must be able to stand and walk on hard surfaces, be able to work in a hot and/or humid environment, be able to lift 25 pounds.
- Must pass a Level 2 background check.

EXTRACTION MANAGER

Reports to: Manufacturing Director

Job Description: Assist in the planning and execution of cannabis production from grinding to separation. Follow all regulatory requirements for medicinal cannabis production. Produce safe medical cannabis products securely, efficiently, and effectively.

Job Responsibilities: Responsible for managing the day-to-day operations of extraction operations in accordance with regulations and standards set by the company. Responsible for the documentation, ordering, and receiving of all inventory and products, arranging deliveries, maintaining facility compliance, and cleanliness.

Core Job Duties

Support and Management:

- Responsible for managing extraction staff, schedules, cultivation processes, inventory, and vendor relations.
- Serves as a role-model and resource for extraction staff concerning products and services, policies and procedures, industry news, and changes in regulations.
- Responds to all employee questions, concerns, or suggestions and takes action when necessary to resolve conflicts.
- Responsible for delegating tasks to processing employees in order to maintain a compliant and clean processing facility.

Extraction Operation Management:

- Oversees all extraction tasks and processes, ensures proper documentation of all applicable activities in accordance with regulations and standards set by the company.
- Plans, coordinates, and oversees the transition of product development by ensuring the proper tasks are executed and all extraction operations are performed safely and properly.
- Oversees supply stock, orders, and deliveries to ensure efficient levels of all extraction inputs and supplies.

Reports and Documentation:

- Maintain accurate records of all extraction activities including employee records, inventory records, extraction records, materials receipt, returns, etc. in accordance with regulations and standards set by the company.

Qualifications:

- BS degree in chemistry and five years of experience with botanical extraction. Industry experience may be considered in place of a degree.
- Two years of experience in a position with managerial responsibilities.
- Excellent communication skills and attention to detail.
- Effective time-management and ability to multi-task.
- Ability to work in a fast-paced, changing and challenging environment.
- Proficient in the use of computer software such as Microsoft Excel and Word and environmental control systems and able to learn other software applications quickly.
- Must be sufficiently proficient in English to read and interpret documents such as safety and security rules, operating and maintenance instructions, procedure manuals, etc. and write routine reports.
- Must be able to stand and walk on concrete floors, be able to work in a hot and/or humid environment, be able to lift 50 pounds.
- Must pass a Level 2 background check.

PRODUCTION MANAGER

Reports to: Manufacturing Director

Job Description: Assist in the planning and execution of cannabis production from batch production to packaging and labeling. Follow all regulatory requirements for medicinal cannabis production. Produce safe medical cannabis products securely, efficiently, and effectively.

Job Responsibilities: Responsible for managing the day-to-day operations of production operations in accordance with regulations and standards set by the company. Provides support for all production employees, including schedules, training, policy and procedure updates, industry news, and product information. Responsible for the documentation, ordering, and receiving of all inventory and products, arranging deliveries, maintaining facility compliance, and cleanliness.

Core Job Duties

Support and Management:

- Responsible for managing production staff, schedules, production processes, inventory, and vendor relations.
- Responds to all employee questions, concerns, or suggestions and takes action when necessary to resolve conflicts.
- Responsible for delegating tasks to processing employees in order to maintain a compliant and clean processing facility.

Production Operation Management:

- Oversees all production tasks and processes, ensures proper documentation of all applicable activities in accordance with regulations and standards set by the company.
- Plans, coordinates, and oversees the transition of product development by ensuring the proper tasks are executed and all production operations are performed safely and properly.
- Oversees supply stock, orders, and deliveries to ensure efficient levels of all extraction inputs and supplies.

Reports and Documentation:

- Maintain accurate records of all production activities including employee records, inventory records, extraction records, materials receipt, returns, etc. in accordance with regulations and standards set by the company.

Qualifications:

- BS degree in chemistry or food science and five years of experience with food production. Industry experience may be considered in place of a degree.
- Two years of experience in a position with managerial responsibilities.
- Excellent communication skills and attention to detail.
- Effective time-management and ability to multi-task.
- Ability to work in a fast-paced, changing and challenging environment.
- Proficient in the use of computer software such as Microsoft Excel and Word and environmental control systems and able to learn other software applications quickly.
- Must be sufficiently proficient in English to read and interpret documents such as safety and security rules, operating and maintenance instructions, procedure manuals, etc. and write routine reports.
- Must be able to stand and walk on concrete floors, be able to work in a hot and/or humid environment, be able to lift 50 pounds.
- Must pass a Level 2 background check.

RESUMES/BIOS

Chief Executive Officer

ROBERT DUNSTAN WALLACE

15105 NW 94 Ave• Alachua, FL 32615
Phone: 352-219-5825 • E-Mail: chnuts@gmail.com

Education

Bachelor of Science with High Honors - University of Florida 1979 – Interdisciplinary Biology in Zoology, Wildlife Ecology and Botany with Minor in Agricultural Science.

Employment

- Founder and President, Chestnut Hill Tree Farm 1981-2015
- Founder and President, Chestnut Hill Outdoors (wildlife) 2012-2015
- Founder and President, Chestnut Hill Orchards (imported chestnut food products) 2012-2015
- Founder and President, Ponce Inlet Development 2004-2015
- Real Estate Broker, Coldwell Banker Commercial 2010-2015

Publications

- Chestnuts and Building a Commercial Chestnut Industry in the U.S. – authored or consulted on more than 100 publications in various horticultural journals – The Chestnut Grower, Northern Nut Growers Association, Pomona (North American Fruit Explorers), multiple national magazines including Whole Earth News, Mother Earth News, American Fruit Grower, Nursery Manager, etc 1985-2015
- Authored or consulted on 50+ articles in national newspapers on chestnuts – New York Times, Washington Post, etc
- Authored or consulted 20+ publications on Oriental Persimmons – various journals 1990-2015
- Editor Chestnutworks, publication of the Chestnut Growers of America 1985-1992
- Editor and Symposium organizer, Chestnuts and Creating a Commercial Chestnut Industry in the U.S. Symposium of the First International Chestnut Industry Conference, Morgantown WV 1987
- An Introduction to Production, Marketing and Economics of Growing Chestnuts in the SE United States. R.D. Wallace and Dr. PJ Van Blokland. Staff Paper 354. Food and Resource Economics Dept, Institute of Food and Agricultural Sciences, 1989

University of Florida

- Chestnuts - The Best Food Plot Tree – authored or consulted 20+ articles for multiple hunting magazines – North American Whitetail, Bowhunting, Deer and Deer Hunting, Quality Whitetails, Wildlife Management News, Peterson's Bowhunting, etc — 2012-2015

Research Experience

- USDA SBIR Research Grant – Clonal Rooting in Chestnut — 1995
- Bird Species Populations and Island Biogeography in Habitat Islands in North Florida – Florida Game and Fish Commission — 1979-1980

Patents & Trademarks

- U.S. Plant Patents for Revival Chestnut, Willamette Chestnut, Carolina Chestnut and Heritage Chestnut – personally wrote the only patents ever given to Chestnut tree varieties — 1987-1990
- multiple Trademarks including: Dunstan Chestnut ™, Chestnut Magic ™, Our Nuts are Bigger ™, Freedom Flowering Pear ™

Seminars and Media Experience

- How to Attract Deer with Food Plot Trees - Quality Deer Management Association – has done multiple presentations for seminars and Deer Steward Management classes, Archery Trade Association, etc. — 2013-2015
- International Plant Propagation Society – presentations on propagation of hard-to-root tree species — 1998-1999
- 20+ TV appearances on Planting Trees to Attract Wildlife with Food Plot Trees – North American Whitetail TV Show, Whitetail Properties TV Show, Gamekeepers, Woods and Waters TV, Fish and Game TV, etc — 2013-2015
- TV Commercials on Sportsmans Channel, Outdoor Channel, Pursuit Channel

Customers for Trees and Chestnut Products

- For Trees - Walmart, Lowes, The Home Depot, Rural King, Farm King, Co-op Feed Dealers, Stark Bros, etc — 1994-2015
- For Chestnut Magic – Walmart, Cabelas, Tractor Supply, Rural King, Farm King, Mills Fleet Farm, Co-op Feed Dealers, etc
- For Chestnut Food products – Whole Foods Market, United Natural Foods, small gourmet food stores and manufacturers

Affiliations/Memberships

- Chestnut Growers of America (Founder and Board of Director) — 1983-2015
- North American Fruit Explorers — 1983-2015
- Northern Nut Growers Association — 1983-2015
- International Plant Propagation Society — 1994-2002
- Florida Nursery Growers and Landscape Association — 1983-2015
- PK Yonge Developmental Research School Board of Trustees (Founder) — 1995-2014
- Gainesville Community Redevelopment Association Board of Advisors — 2012-2014
- Gainesville Area Innovators Network
- Emergent Growth II Angel Investment Fund, Gainesville FL

Real Estate Development Projects

- Red Oak Estates Subdivision, Alachua FL
- Progress Plaza, Alachua FL
- 1310 Retail Center, Shands Hospital, Gainesville FL

- North Causeway Offices, New Smyrna Beach FL
- Palm Ridge Plaza, The Villages, FL
- Sabal Palm Plaza, The Villages, FL

Interests

- Birding – 790 species seen in North America and 2500 species seen worldwide
- Sport Fishing and Fly Fishing
- Photography
- Travel
- Black Belt in Aikido

Deborah Gaw

15105 NW 94th Ave., Alachua, FL 32615
352-246-3045
dgaw55@msn.com

Professional Profile

Co-owner and CFO of Chestnut Hill Tree Farm, a leader in FL's wholesale tree industry and producer/distributor of a unique line of specialty fruit and ornamental trees for the Southeastern United States since 1983. Experienced horticulturist with a diverse knowledge of plant propagation, production, nutrition and pest management systems. Educator of growing specialty fruit and nut crops throughout the US. Ties with the University of Florida's Environmental Horticulture Department and Fruit Crops Department.

Professional Experience

1986-Present

Built CHTF from its inception in 1983 into one of Florida's leading tree farms.

- Established production systems for bare-root and container grown crops
- Established propagation systems, including seed, cutting and grafting propagation, maintenance of stock material and seed collection
- Introduced a unique cultivar of chestnut tree, which established a new nut crop in the US,along with a number of new fruit and nuts crops. Educates orchardists on crop production and management
- Coordinates retail and wholesale mail order business
- Handled logistics and distribution to large wholesale nursery accounts
- Assists in sales and advertising campaigns
- CFO in charge of all accounting and bookkeeping functions including accounts payable and receivable, tax preparation
- Handles HR and payroll
- Purchaser of equipment and supplies
- Works in cooperation with management and production team to achieve production and sales goals

1983-1986

Biological Assistant, Dept. Of Environmental Horticulture, Univ. of Florida

- Conducted research on post-harvest physiology of a variety of key economic flowering crops, such as poinsettias, azaleas and chrysanthemums for the flora cultural industry
- Knowledge of growing environmentally-controlled flowering crops and researching cultural conditions affecting their longevity, such as lighting, fertilizer and watering regimes
- Statistical analysis of data
- Trained in electron microscopy techniques
- Studied plant breeding
- Knowledge of plant growth regulators and their effects on plant production

1979-1983

Biological Assistant, Dept of Environmental Horticulture, Univ. of Florida

- Managed the Department's Plant Tissue Analysis Laboratory
- Prepared plant leaf samples and reagents under sterile conditions
- Performed nitrogen analysis using kjeldahl extraction method
- Operated and maintained atomic mass spectrometer for micro analysis of key nutritional elements
- Managed a staff of laboratory assistants
- Assisted staff and graduate students in various departmental research projects
- Purchased laboratory supplies/gases and equipment

Education 1976-1978

B.S in Agriculture, University of Florida, Dept. Of Environmental Hort.

1973-1975

Rollins College, pre-med program

Affiliations Chestnut Growers of America

Northern Nut Growers

North American Fruit Explorers

Florida Nursery Growers and Landscape Assoc.

Florida Pomegranate Assoc.

International Plant Propagators Society

Personal Edible Gardening/Cooking

Working Out/Running/Hiking

Traveling the world

SUSAN L. BAUMGARTNER, PHARM.D., MBA

2528 NW 138th Terrace • Gainesville, Florida 32606
678-602-5701 • susan.l.baumgartner@gmail.com

PROFILE

Accomplished business executive with expertise in the successful development and commercialization of pharmaceutical products and medical devices. Outstanding leader and strong performer in all educational and professional endeavors with demonstrated success across key positions within a top-tier pharmaceutical company and technology startups. Excellent communicator with a unique balance of scientific and business expertise, and exceptional active listening and analytical skills. Proven ability to maximize the performance of brands, organizations, operations, and people. Trusted advisor for executive teams, clients, strategic partners, colleagues, advisors, and board members. Breadth of expertise in strategic planning, business development, sales, marketing, operations, regulatory affairs, product development, project management, medical strategies, and scientific affairs. Deep ties to the University of Florida, and engaged in programs to support technology licensing and advancement of technology startups. Dedicated to the successful commercialization and adoption of innovation that makes a difference in health care.

PROFESSIONAL EXPERIENCE

INDEPENDENT CONSULTANT — 2015 – Present

XHALE, INC. — 2011 – 2015

Vice President of Business Development, Gainesville, FL (2011 – 2015)
Key member of the Executive Management Team for Xhale, a privately-funded startup and emerging leader in health monitoring technologies, reporting directly to the CEO and then to the President of Xhale Smart, a wholly-owned subsidiary. Responsible for developing and commercializing an innovative breath-based medication adherence monitoring system.

- Developed corporate strategy and product strategy for a novel medication adherence monitoring technology, and played an instrumental role in moving the company from an idea to a viable business operation.
- Negotiated collaborative development agreements with a top-tier pharmaceutical client resulting in strategic funding, and extracted significant value from this partnership.
- Initiated and developed a critical strategic alliance with a global leader in pharmaceutical formulations and manufacturing.
- Managed regulatory affairs, and led efforts with the U.S. FDA to identify and pursue efficient regulatory pathways for the system consisting of a food additive for inclusion in a pharmaceutical dosage form and a monitoring device for home use.
- Orchestrated sales, marketing, scientific communications, corporate relations, and Advisory Board activities to achieve business, financial, product development, market development, and client goals.
- Engaged pharmaceutical companies, contract research organizations (CROs), the National Institutes of Health (NIH), key opinion leaders, and clinical research service providers to accelerate adoption of the system and accomplish business goals.
- Made pivotal strategic and tactical decisions with respect to business planning, product development, client engagement, regulatory strategy, clinical studies, and pipeline investments that laid the foundation for company growth.

eTECT, LLC — 2010 – 2011

Commercial Lead, Roswell, GA (2010 – 2011)
Senior Commercial Leader for development-stage company with responsibility for orchestrating business development and customer engagement efforts. Developed and implemented strategic and tactical plans to bring to market an innovative medication adherence monitoring system that uses wireless ingestible sensors and a novel in vivo communications platform.

MERCK & COMPANY, INC., UNITED STATES HUMAN HEALTH DIVISION — 1996 – 2010

Senior Director of Commercial Operations, Southeast Commercial Operations Group, Atlanta, GA (2008 – 2010)
Senior Sales Leader with responsibility for directing commercial operations in South Carolina, Western North Carolina, and the Northeast Coast of Georgia. Successfully managed a portfolio of prescription medications in the asthma, allergic rhinitis, diabetes, hypertension, and migraine markets with profit and loss responsibility, annual sales objective of $144 million, and annual operating budget of $8.7 million. Led, coached, and managed a team of two Medical Group Account Managers, four Customer Team Managers, and 48 Customer Representatives.

- Designed new organizational structure and implemented customer-centric commercial model that resulted in 2009 portfolio performance of 102.4% of planned sales objective and #1 Southeast rank on portfolio business results.
- Significantly increased customer trust and value scores, employee engagement scores, and Region culture scores.
- Developed commercial strategy for the Region that streamlined operations, improved productivity, enhanced quality of customer interactions, fostered internal integration, and capitalized on growth opportunities.

MERCK & COMPANY, INC., UNITED STATES HUMAN HEALTH DIVISION

Senior Business Director, **Southeast Business Group,** Atlanta, GA (2006 – 2008)
Senior Sales Leader with responsibility for achieving financial goals, managing customer relationships, and launching three new primary care products in diverse markets within Tennessee, Kentucky, West Virginia, North Carolina, and South Carolina. Successfully managed a portfolio of prescription medications in the asthma, allergic rhinitis, and diabetes markets, as well as vaccines for the prevention of cervical cancer, genital warts, and herpes zoster. Led, coached, and managed a team of eight Business Managers and 92 Sales Representatives.

- Outperformed Fortune 500 best-in-class coaches and Merck peers on coaching effectiveness score.

Director, Strategic Planning and Support, Southeast Business Group, Atlanta, GA (2005 – 2006)
Developed strategic plans for the Southeast Sales Team in partnership with the Vice President and Senior Business Directors to drive annual revenue of $2.4 billion and long-term growth. Provided analytical, operational, and decision support that informed key decisions related to sales strategy, operational excellence, performance management, and resource allocation. Led team of four Region Analysts and one National Technical Analyst. Served as Lead Planner for the diabetes franchise.

Business Manager, Southeast Business Group, Boca Raton, FL (2002 – 2005)
Sales Manager with responsibility for achieving financial goals and managing customer relationships in the dynamic South Florida market. Successfully managed a portfolio of prescription medications in the osteoporosis, asthma, allergic rhinitis, arthritis, analgesia, and dyslipidemia markets. Led, coached, and managed a team of 14 Sales Representatives.

- Achieved final-year performance in the top 10% of Business Managers in the United States.
- Earned 2005 Special Achievement Award for Outstanding Leadership and 2004 Quality Customer Selling Award.

Senior Manager, Medical Strategies Group, Upper Gwynedd, PA (2001 – 2002)

Marketing Manager, Analgesic/Anti-inflammatory Therapeutic Business Group, Upper Gwynedd, PA (1999 – 2001)

- Earned Marketer of the Year, Best Customer Program, Customer Focused, and Field Favorite Awards.

Project Manager, Market Integration Team for VIOXX, West Point, PA (1998 – 1999)

Launch Manager, Market Integration Team for PROPECIA, West Point, PA (1997 – 1998)

- Earned Vice President's Distinguished Service Award.

Cardiovascular Consultant, Southeast Business Group, Jacksonville, FL (1996 – 1997)

EDUCATION

Doctor of Pharmacy, Highest Honors, University of Florida, 1996
Master of Business Administration, University of Florida, 1996

- Perry A. Foote Award for Distinguished Scholarship (Top Graduate in the Doctor of Pharmacy Program)
- Searle Fellowship in Pharmacy, First Place in National Competition
- University of Florida President's Recognition of Outstanding Students Award
- Rho Chi Pharmacy Honor Society, President; Rho Chi Gene Gramling Award for Academics and Leadership
- Eli Lilly Award for Outstanding Leadership, Academics, and Extracurricular Activities
- American Pharmaceutical Association – Academy of Students of Pharmacy Mortar and Pestle Professionalism Award
- Beta Gamma Sigma Business Honor Society

PROFESSIONAL ACHIEVEMENTS

- Director, Xhale Smart Board of Directors (2012 – 2015)
- Co-inventor on provisional patent application for "Improved Self Monitoring and Reporting Therapeutics, SMART®, Medication Adherence Monitoring Method, Device, Compositions of Matter and System" (2014)
- Co-inventor on design patent application for "Miniature Portable Gas Chromatograph" (2013)
- Invited Mentor, Empowering Women in Technology Startups (Ewits®) Program (2012, 2013, 2015)
- Member, National Advisory Board for University of Florida College of Pharmacy (2008 – 2009)
- University of Florida Outstanding Young Alumni Award (2007)
- Commencement Speaker, University of Florida College of Pharmacy Graduation (2000)

R. Dunstan Wallace II Resume

- Graduated with Honors from Buchholz High School Finance Academy 2007
- President of Finance Academy
- Low Brass Captain Buchholz Wind Symphony and Golden Regiment Marching Band
- member of Phantom Regiment Drum Corps marching band summers 2007-2008-2009
- Bachelor's Degree from University of Florida Fisher School of Accounting in the Warrington College of Business Administration 2011
- Intern in Tax Accounting at Austin, Bovay and Gilman CPA - 2010
- Chestnut Hill Tree Farm – 2011-12 - build complete websites and set up shopping carts for www.chestnuthilltreefarm.com and www.chestnuthilloutdoors.com

- Set up Quick Books accounting for website businesses – complete knowledge of Quick Books accounting software 2011-12
- Staff Accountant, University of Florida Accounting Department, Grants Division 2013-14

Age 25.
In Europe for summer 2015, will return August and submit Level 2 Screen (no arrests or tickets).

Security Director

JOHN POWELL

649 WSETBROOK ROAD, DOTHAN, ALABAMA 36303/ 850-491-8886 / jrpowell@graceba.net/ LinkedIn

SUMMARY

An experienced law enforcement and public safety professional with a solid academic foundation who has progressively served at all levels with increasing responsibility and accountability gaining real life experience and professional training. This experience enables effective operations in planning, asset allocation, diversity/gender awareness, personnel management and negotiations, strategic planning, tactical response, organizing, recruiting, budgeting, succession planning and relationship building. Currently certified in Florida as a law enforcement officer.

PROFESSIONAL EXPERIENCE

2011-PRESENT

Law Enforcement, Public Safety/ Security and Management Consultant

Providing professional expertise in the area of law enforcement policy and procedure. Adviser in public safety and security matters. Partnering with the federal, state and local government agencies providing a deep understanding of the issues, organizational protocols and challenges that surround today's law enforcement decision makers. Providing a combination of management consulting, technical expertise, and operational knowledge of law enforcement, public security and management concepts.

- MARICOPA COUNTY, ARIZONA PROTECTIVE SERVICES DEPARTMENT - DIRECTOR. Provide guidance and direction in the operations involving security measures to protect county assets and the public from hostile acts. Provide dignitary protection to elected officials. 75 armed personnel with a $5mil operation budget.

- UNITED NATIONS/UNITED STATES DEPARTMENT OF STATE – Bureau of International Narcotics and Law Enforcement Affairs (INL)/INERNATIONAL POLICE-HAITI. Selected to serve as the US Law Enforcement Contingent Commander (Police Advisor Level V) by the US Department of State and United Nations. National representative of the contingent and, as such, liaise with United States and Haitian national authorities, when appropriate and if possible, on issues pertaining to the betterment of the mission. Responsible for operational control and strategic assignment of all US law enforcement personnel, supervising and managing 100 staff. Ensured all police advisors provide high quality service and conduct themselves in a professional and ethical manner. *U.S. Public Trust clearance required.

- TEXARKANA ARKANSAS SCHOOL DISTRICT INTERIEM SECURITY DIRECTOR to implement safe schools initiative and manage training of security professionals for the school district. Sworn as a Miller County, Arkansas Sheriff's Deputy.

- COMPUTER EVIDENCE SPECIALISTS (CES), Federal Grant assistance and implementation with US Food and Drug Administration.

- ENGILITY CORPORATION-LAW ENFORCEMENT PROFESSIONAL (LEP) – Afghanistan, provided investigative and law enforcement training to the US

Military and Afghanistan National Police. Managed field operations for LEPs. Required US Government Secret Security Clearance.

2009-2011 **Director**, *FLORIDA DEPARTMENT OF BUSINESS AND PROFESSIONAL REGULATION/Division of Alcoholic Beverages & Tobacco (ABT)*

The of Division of Alcoholic Beverages and Tobacco licenses the alcoholic beverages and tobacco industries, collects and audits taxes and fees paid by the licensees and enforces the laws and regulation of the alcoholic beverage and tobacco industry pursuant to Florida Statutes. Florida has approximately 75,000 active beverage and tobacco license holders. Sworn State of Florida Law Enforcement Position–executive appointment approved by the Governor. Directed the daily operations of three bureaus of the Division; Law Enforcement, Auditing and Licensing.

- Managed 13 statewide regional offices with 337 staff, 155 sworn law enforcement investigators and 182 civilian personnel. Closely developed, managed and monitored a divisional budget of $25 million dollars. Responsible for the collection and accountability of over $1 billion dollars in tax revenue. Ensured Division maintained all standards required for continued accreditation status through the Commission for Florida Law Enforcement Accreditation. Division re-accredited under my tenure.
- Award winning innovative use of technology achieving efficiency. 10% reduction in operational cost without reduction in services to the customer or reduction in staff.
- Served as **Deputy Secretary** for the Florida Department of Business and Professional Regulation under interim appointment, Governor-approved, (2010). Managed and supervised four regulatory agencies; Alcoholic Beverages & Tobacco; Timeshares & Mobile Homes; Hotels & Restaurants; Pari-mutuel Wagering.

1999-2009 **Chief of Police**

Planed, organized, and directed the law enforcement programs of the City. Work involved responsibility for the protection of life and property through varied programs of enforcement, detection and prevention of crime and traffic accidents, planning and directing emergency response activities. Work also involved a full managerial and supervisory role including the establishment of policy, evaluation and adherence to prescribed standards, planning for and implementing special enforcement activities, preparing special state, federal and local reports, analyzing crime and accident trends, cooperating with other law enforcement and local agencies, budget preparation and management and supervision of all department personnel. Work was performed in accordance with departmental policy and state and federal law.

City of Dothan, Alabama (2005-2009)

- Sworn State of Alabama law enforcement position – Municipal law enforcement department providing service to a diverse community of 67,000

residents. Department of 155 sworn staff and 100 non-sworn personnel providing professional staff to the Patrol, Criminal Investigations and Support Services Divisions. These functions included animal services, radio shop, city jail (129 inmate capacity), municipal court security and emergency communications center. $30 million dollar biennial budget.

City Wilson, North Carolina (2001-2004)

- Sworn State of North Carolina law enforcement position – Municipal law enforcement department providing service to a diverse community of 50,000 residents. Department of 120 sworn staff and 20 non-sworn personnel providing professional staff to the Patrol, Criminal Investigations and Support Services Divisions. $11 million dollar annual budget.

City Hartsville, South Carolina (1999-2001)

- Sworn State of South Carolina law enforcement position – Municipal law enforcement department providing service to a diverse community of 8,000 residents. Department of 40 sworn staff and 10 non-sworn personnel providing professional staff to the Patrol, Criminal Investigations and Support Services Divisions. $2 million dollar annual budget.

Implementation of crime reduction programs such as; National Night Out (National Award winner), Sexual Offender Accountability Program (S.O.A.P.) and Data-driven intelligence led policing using crime analysis and monitoring to identify crime trends and hot spots. Implemented foot and bicycle patrols. Launched departmental accreditation efforts through the Commission on Accreditation for Law Enforcement Agencies (CALEA).

1983-1996 **SWORN LAW ENFORCEMENT OFFICER**

- FBI Special Agent (1996-1999) assigned to white collar crime investigations, violent fugitive felon investigations, and narcotic crimes and served as law enforcement liaison.

- Escambia County Florida Sheriff's Office (1983-1996) served as Corrections Officer, Patrol Officer, Narcotics Investigator, Field Training Officer, Property and Persons Crime Investigator, Robbery and Homicide Investigator. Sheriff's supervisor, SWAT operator / team leader.

EDUCATION | CURRENT CERTIFICATIONS

1994 MS, Public Administration, *Troy University*

1992 BS, Criminal Justice/minor in Business, *Troy University*

1990 AS, General Studies, *Troy University*

Florida Law Enforcement Certification (current); Florida Certified Insurance Adjuster (current). Previous Adjunct instructor in Criminal Justice and Management – George Stone Technical School (Florida law enforcement academy), Texas A&M, Coker College, Hartsville, S.C., Florence/Darlington Technical College, S.C., Barton College, Wilson, N.C., and Troy University, Dothan, AL.

PROFESSIONAL TRAINING:

FBI Academy (96–19); FBI Law Enforcement Executive Development Seminar (LEEDs Session 59); FBI Southeastern Law Enforcement Executive Development Seminar; FBI Carolina Command College; Florida Department of Law Enforcement Chief Executive Seminar (FDLE) (Class 43); Anti-Defamation League (ADL) Advanced Training; University of Virginia Weldon-Cooper Center for Public Service Senior Executive Institute (SEI); University of Arkansas Rural Executive Management Institute; NIMs certifications; Incident Command (ICS); Emergency Management.

CODI COLEMAN

odicoleman4@gmail.com

Summary:

I have been working with and growing cannabis for six years. During the first three years, I had the opportunity to work under several mentors while maintaining large-scale outdoor grow sites. Additionally, I have managed multiple departments in cultivation and processing facilities, managing and directing employees and overseeing all aspects of day-to-day operation. In the past three years, I have become self-employed by maintaining patients and owning and operating a private medical cultivation facility.

Education:

I have attended the cannabis-affiliated Oaksterdam University, where I graduated from both the basic and advanced seminars.

Summary of Skills:

- Cannabis garden design, set up and irrigation
- In house propagation, maintaining a stock plants as well as taking clones or cuttings.
- Selective breeding processes
- Nutrients and additives to promote vegetative and flower growth, I prefer using only organic materials in my garden.
- Recognizing pests and diseases common to cannabis plants and how to combat them.
- Constructing a light deprivation house to produce off season crops or use supplementary lights to prolong the vegetation period.
- Multiple pruning, trellising and training techniques.
- Tagging and labeling everything from seed to harvest.
- Good agricultural practices including not over fertilizing or stripping the mineral content from the surrounding land.
- The microbial life needed to promote healthy soil food web
- Organic chemistry of cannabis and cannabinoids.
- Multiple forms of cannabinoid extractions, one in which I excel is butane extraction producing a pristine glass like product.
- Also I have recently started a medical and recreational cannabis garden consultation business, Simple Leaf Solutions LLC, where I assist new comers with design, set up, maintenance and harvest.

Richard Tempel, MD, FACEP. FAAEM

1350 Celebration Avenue
Celebration, FL 34747
407-756-3717
drtempel@gmail.com

EDUCATION

2003 – 2006	Duke University Emergency Medicine Residency Program, Chief Resident
1999 – 2003	University of Maryland School of Medicine, Medical Doctorate
1996 – 1999	University of Maryland College Park, Bachelors of Science in General Biology
1994 – 1996	Towson University, premedical curriculum

EMPLOYMENT

November 2008 – present	Florida Emergency Physicians Ultrasound Coordinator, Florida Hospital Celebration 2009-11
June 2006 – November 2008	Emergency Physician, Saint Joseph Medical Center, Towson, MD Osler Drive Emergency Physician Asociates (ODEPA)
November 2006 – Nov 2008	Emergency Physician, Ultrasound Director Upper Chesapeake Health System

ACADEMIC APPOINTMENTS

Clinical Preceptor, Broward Health/NOVA Family Medicine Residency Program
University of Central Florida (UCF), College of Medicine, volunteer faculty

LICENSURE AND CERTIFICATIONS

American Board of Emergency Medicine (ABEM), June 2007
State of Florida Medical Licensure
Aesthetic Medical Educators Training, Inc., Botulinum Toxin and Dermal Fillers

PUBLICATIONS

1999 Teleradiology in urology: effect of varying compression algorithms on clinical decision making. Abstract. Engineering and Urology Society 14th Annual Meeting. Dallas, TX.

2006 *Infectious Disease in a disaster zone*. Disaster Medicine. Ciottone editor. Section 4, Chapter 46. Mosby. March 2006. ISBN:0323032532

2006 Proposing short-term observation for the disposition on patients with decompression illness; UHMS, Vol 35, No 2, June 2006.

AWARDS AND HONORS

Chief Resident, Division of Emergency Medicine, Department of Surgery, DUMC, 2005-06
Graduating Resident of the Year 2006, Duke University Medical Center
Teaching Resident of the Year, 2006, Duke University Medical Center
Golden Key National Honor Society, University of Maryland College Park, 1998-99
Citation in Archaeology, University of Maryland College Park, 1999

LECTURES/PRESENTATIONS

1/8/2015 - *Controlled Dangerous Substances and Medicinal Marijuana*. Celebration, FL
6/25/2009 – *Allergy and Anaphylaxis.* Florida Emergency Medicine Residency Conference. Orlando, FL
5/28/2009 – *Electrolyte Disorders*. Florida Emergency Medicine Residency Conference. Orlando, FL
11/22/2008 – *Introduction to Emergency Ultrasound.* Lecture, 2008 Radiology Forum, Upper Chesapeake Medical Center. Bel Air, MD
1/ 2005 - Instructor, Duke University Physician Assistant Program, Lecture titles, *Shock* and *ENT Emergencies.*
June 2005/2006 - Disaster Planning Coordinator/Group leader, Duke University Disaster Medicine Intercession, Table top coordinator.
10/18/2004 - ACEP Scientific Assembly; San Francisco, CA. Proposing short-term observation for the disposition of patients with decompression illness: abstract.
3/1/2004 - National Association of Community Health Centers Inc. 2004 Community Health Forum; Orlando, FL. Titles; 'The Importance of Preventive Medicine' and 'Americorp Career Fair: Medicine'

PROFESSIONAL ORGANIZATIONS

Fellow of the American College of Emergency Physicians (ACEP), Florida Chapter
Fellow of the American Academy of Emergency Medicine (AAEM)
American Medical Association, Florida Chapter (FMA)

Curriculum Vitae
Lawrence B. Erlich, M.D.

Lawrence B. Erlich, M.D.

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Suite 406
Celebration, Florida 34747

(407) 852-8882
(407) 830-5252

Specializing in:

General,
Forensic
and
Addiction
Psychiatry

CERTIFICATIONS:

1974 - American Board of Psychiatry and Neurology and Psychiatry
1990 - American Board of Quality Assurance and Utilization Review Physicians
1991 - American Society of Addiction Medicine
1993 - Medical Review Officer Certification Council
1994 - American Board of Psychiatry and Neurology added Qualifications in Forensic Psychiatry
Re-certified 2007
1996 - American Board of Psychiatry and Neurology added Qualifications in Addictions Psychiatry
Re-certified 2007
2001 - Substance Abuse and Mental Health Services Administration federal waiver to prescribe Suboxone
2007 - Re-certification in Forensic Psychiatry and Addiction Psychiatry

FELLOWSHIPS:

1977 - Distinguished Life Fellow of the American Psychiatric Association
1978 - Fellow-American Academy of Forensic Sciences
1988 - Fellow-American College of Medical Quality

ACADEMIC APPOINTMENTS:

1994 - 1996 - Professor of Criminal Justice and Legal Studies at the University of Central Florida
1979 - 1987 - Clinical Assistant Professor of Psychiatry, Robert Wood Johnson Medical School, Piscataway, New Jersey

AWARDS:

1959 - Phi Beta Kappa Academic Honor Society
1963 - Alpha Omega Alpha Medical Honor Society
1971 - Henry P. Laughlin Award for being the
1976 - Award for Service
1982 - Award of Merit
1983 - Award of Merit
1987 - Award for Service
1995 - Award for Service from the Altamonte Springs, Florida Police
2000 - Award for Honorable Mention from the American Psychiatric Association for the 2000 Newsletter of the Year Award competition for the Newsletter of the State of Louisiana

PROFESSIONAL SOCIETIES:

1976 – 1979 - President, South Jersey Psychiatric Association
1978 - 1979 - Chairman, Psychiatric Section, American Academy of Forensic Sciences
1979 – 1981 - Executive Committee, American Academy of Forensic Sciences
1973 - 1982 - Numerous Committees of the New Jersey Psychiatric Association as member and chairman
1977 - 1979 - Secretary, New Jersey Psychiatric Association
1979 - 1980 - Executive Committee, Camden County Medical Society
1979 - 1981 - Vice President for Internal Affairs, New Jersey Psychiatric Association
1981 - 1982 - President Elect, New Jersey Psychiatric Association
1982 - 1983 - President, New Jersey Psychiatric Association
1988 - Present - Member of The American Society of Addiction Medicine
1988 - Present - Fellow of the American College of Medical Quality

CHRONOLOGY :

1955 - 1959 - B.A. in Chemistry, College of the University of Pennsylvania, Philadelphia, Pennsylvania
1959 - 1963 - M.D., Medical School of the University of Pennsylvania, Philadelphia, Pennsylvania
1963 - 1964 - Internship, Kings County Hospital, Seattle, Washington

1964 - 1965 - Residency in General Practice, Mountain View General Hospital, Tacoma, Washington
1965 –1966 - Attending, Student Health Service, University of Florida, Gainesville, Florida
1966 - 1968 - United States Navy - General Medical Officer
1968 – 1971 - Residency in Psychiatry, Institute of the Pennsylvania Hospital, Philadelphia, Pennsylvania
1976 – 1977 - Special Fellowship in Forensic Psychiatry, University of Pennsylvania, Philadelphia, Pennsylvania
1971 - 1987 - Private Practice of Psychiatry Philadelphia, Pennsylvania and Cherry Hill, New Jersey
1983 - 1984 - Attending, The New Jersey Hospital for the Criminally Insane, Vroom Building, Trenton, New Jersey
1987 - 1989 - Florida Psychiatric Associates, Winter Park, Florida
1989 – 1995 - Private Practice Altamonte Springs, Florida
2000 – 2002 - Behavioral Health, Winter Haven Hospital
1971 - Present - Private Practice of Addiction Medicine in Addiction Units (The Institute of the Pennsylvania Hospital and Florida Hospital) and in general hospital units (Our Lady of Lourdes Hospital and Cooper Hospital, Camden, New Jersey)
2011- Present - Founder and Medical Director of Comprehensive Behavioral Healthcare of Central Florida, Celebration, Florida

MEDICAL STAFF APPOINTMENTS :

1988 – 1995 - Consulting, Winter Park Memorial Hospital, Winter Park, Florida
1987 – 1995 - Attending Physician, Florida Hospital, Orlando, Altamonte Springs and Apopka
1971 – 1987- Attending, Our Lady of Lourdes Medical Center, Camden, New Jersey
1986 – 1987- Chief of Psychiatry, Our Lady of Lourdes Medical Center, Camden, New Jersey
1971 - 1987 - Attending, Institute of the Pennsylvania Hospital, Philadelphia, Pennsylvania
1973 - 1980 - Attending, Cooper Medical Center, Camden, New Jersey
1977 - 1979 - Acting Chief of Psychiatry, Cooper Medical Center, Camden, New Jersey
1975 - 1987 - Consultant, Deborah Heart and Lung Center, Browns Mills, New Jersey
1980 - 1982 - Consultant, The Forensic Hospital of the State of New Jersey, Vroom

Building, Trenton, New Jersey

1981 - 1985 - Consultant, St. Lawrence Rehabilitation Center, Lawrenceville, New Jersey

1986 - 1987 - Consultant, North Princeton Developmental Center, Skillman, New Jersey

1995 - 2000 - Attending, Baton Rouge Medical Center, Baton Rouge. Louisiana

1995 - 2000 - Meadow Wood Hospital, Baton Rouge, Louisiana

MEDIA APPEARANCES:

1988 to 1995 - Various appearances on various topics on local television news programs, Orlando, Florida

PUBLICATIONS: 1977-1993

1977 - 1979 - Editor of the Newsletter, New Jersey Psychiatric Association

1979 - Medical-Legal Digest for New Jersey Psychiatrists, New Jersey Psychiatric Association, Chapter 16 –Civil Rights of Mental Patients

1992 - November - Letter to the Editor concerning costly delays in the Workers' Compensation System

1987 - The New Jersey Trial Lawyer, Fall Issue –Psychic Trauma Secondary to the Death of a Child

1991 - The New Jersey Trial Lawyer, March Issue –Stress Management for Executives

1993 - Newsletter of the Florida Association of Self-Insured

PUBLICATIONS: SINCE 1997

1997 - July - Book Review of Karch, "The Pathology of Drug Abuse." Journal of Forensic Sciences, Volume 42, #4.

1997 - April - Book Review of Hickley, "Goodbye My Little Ones" AAAP Newsletter, Volume XII, #2,

1997 - September - Book Review of Sederer, "Outcomes Assessment in Clinical Practice, Journal of Forensic Sciences, Volume 42, #5.

1998 - Book Review of Elyn and Behnke, Jekyll and Trial, (Multiple Personality Disorder and Criminal Law), American Journal of Medical Quality, Volume 12, #1, Spring

1998 - November - Book review of Blane, Brunner, and Wilkinson, "Health and Social Organization" JAMA

1998 - National Institute on Drug Abuse

1999 - January - Book review of Wetherington, Cora Lee and Roman, Aeele B., Newsletter of the American Academy of Addiction Psychiatry

2001 - *A Textbook of Forensic Addiction Psychiatry and Medicine.* Erlich, Lawrence B., M.D., Charles C. Thomas, LDT. Springfield, Illinois

2004- April- JAMA Book review, Principals and Practice of Forensic Psychiatry, edited by Richard D. Rosner, Oxford University Press

PRESENTATIONS :

2001 - July 11-15, Employment Law Trial Skills, Stetson University College of Law, Office of Continuing Legal Education,

2001 - November 23, Certification of Instructor Approval, Florida Department of Insurance, #1076333/CE011

2002 - April 8 - 10, Florida Society of Addiction Medicine Annual Meeting, lecture on Forensic Addiction Medicine

2002 - June 14, The Academy of Florida Trial Lawyers, Lectures on the use of pain practitioners in trial law

2002 - July 7, American Society of Addiction Medicine, Course on Forensic Addiction Medicine, Lecture on Dr. Erlich's book

Brady Thomas Blake

T: 321-239-3162
E: bblake22@hotmail.com

Education

Bachelor of Science, Business Administration — Graduated August 2003
University of Central Florida, Orlando, Florida

Employment

3D Cannabis Center — 2014 - Present
-Facility Grow Manager

- Created procedures to increase and streamline production
- Trained new hires on proper inventory and storage practices

-Consultant

- Helped facilitate the transition to recreational sales
- Developed and trained processes to ensure compliance with city and state law

Colorado Alternative Medicine — **2010 - 2014**
-Senior Operations — 2013 - 2014
-Facility Manager/ Lead Grower — 2013 - 2014

- Implemented and managed daily processes and procedures for 240,000 watts of flower production
- Ensured all employees followed compliance guidelines provided by the MMED
- Inventoried and monitored 4,000 plants daily from clone to harvest using METRC tracking
- Increased production by 30%

-Quality Control/ Harvest Manager — 2010- 2014

- Trained and managed 5-15 trimmers
- Ensured all product was processed to the highest standard of quality
- Confirmed proper packaging, inventory and storage for 60-100lbs. of product monthly

-Lead Trimmer — 2010 – 2010

- Efficiently manicured high quality flower
- Recorded and informed management of daily production

E & A Enterprises — 2009
-Service Technician

- Restaurant equipment service and repair
- Gas, electric, plumbing, and general repair
- Maintained multiple T.G.I. Friday's restaurants in one of their largest markets.
- Provided around the clock emergency repair work

BAGS Inc. — **May 2005– Sept. 2008**
-Account Manager, Disney's All Star Resorts — Oct. 2007– Sept. 2008
Bell Services/ Resort Airline Check-in

- Upheld a seamless participant relationship with Disney management

- Trained and monitored guest service at all three All Star Resorts
- Collaborated with the Disney Magical Express team, major airlines and airports to recover lost luggage
- Completed weekly schedules for 50-60 employees
- Coordinated arrival and departure assistance for many large groups

-Account Manager, Disney's Pop Century Resort Jan. 2007– Oct. 2007
Bell Services/ Resort Airline Check-in

- Initiated and led the luggage department upon BAGS Inc. becoming a Disney participant
- Trained and placed opening team
- Maintained a staff of 2-3 shift managers and 40 employees

-Area Manager, Disney World Resorts Sept. 2005 – Jan. 2007
Resort Airline Check-in

- Managed several zones at all 19 Disney World Resorts
- Traveled six weeks to Denver to assist in opening two remote airline check-in stations at the Hyatt Regency & Grand Hyatt

-Ground Security Coordinator, Disney's Animal Kingdom Lodge May 05'–Sept. 05'
Resort Airline Check-in

- Supervised daily operation
- Ensured all agents followed Security Directives provided by the TSA

Hollister Co. Feb. 2004 - April 2005
-Assistant Store Manager, Altamonte Mall

- Brought store to a regional low shrink rate of 1.6%
- Traveled to provide support for stores in Ocoee, Naples and Tampa, Florida
- Recruited staff and held group interviews

Achievements

Vice President of Recruitment, Sigma Phi Epsilon Fraternity Fall 2000 – Spring 2001
Dean's List, University of Central Florida
Intramural Champion UCF: flag football, soccer, softball, & floor hockey

Samuel Glucksman, DPM

Samuel Glucksman, DPM, the crop management specialist and primary account manager at Glades Crop Care, Inc. currently directs all cultivation operations for the East coast and Homestead divisions. With an extensive educational background in horticulture, receiving a B.S. in botany and PhD in plant medicine from the University of Florida, his continuing experience in the agriculture industry has led him to be a skilled expert and frontrunner in the cultivation and research of diverse plants. He has successfully developed detailed protocols for company operations from diligent field research, providing growers with the best possible organic and conventional recommendations to solve pest, disease, and cultural issues (i.e. pesticide application, etc.). He has directed environmental controls and pest management, providing help to individual's growing issues. Additionally, Dr. Glucksman is an expert in good agricultural practices, and heads the human resources, administrative, and customer service departments at Glades Crop Care, Inc.

A seasoned and researched cultivator and superintended in the horticulture industry, Dr. Glucksman's successful career has provided him with vast regional knowledge. Dr. Glucksman is considered a leader in the agriculture industry in Florida resulting from years of research and experience growing and harvesting crops in the State. His roles in the industry have ranged from a field technician and graduate assistant at the University of Florida, to the assistant field studies coordinator and crop management specialist at Glades Crop Care, Inc.

Dr. Glucksman's established knowledge and long-term involvement in the scientific field enables him to bridge production optimization and research enhancements in plant medicine to the cannabis cultivation industry. Years of progressive experience in the field cause Dr. Glucksman to bring valuable scientific research and advisory services to the company. Dr. Glucksman will be an important asset in the development of the company's fundamental and compliant production practices.

Kristopher M. Palmer

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Lakewood, CO 80228
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Summary

I have built and operated gardens from single warehouse sites up to a 190,000 watt operation with two different production sites, totaling approximately 18,000 sq. ft. I have over 13 years experience with hydroponics such as deep-water culture, flood and drain, top feed and nutrient flow technology. The typical mediums used have been coco, soil, rock wool and grow stones. I also have over 5 years experience with aeroponics and commercial growing operations in Colorado. Thru the years, I have had the ability to consult multiple other gardens. I believe these experiences have helped broaden my understanding of efficiently designing a system based on the building setup. I have had the advantage of helping multiple gardens deal with costly problems that could have been avoided by proper setup and design. My most valuable assets are my knowledge of costs associated with the industry and the ability to design a production facility that also focuses on the reduction of man hours and efficiently staging of materials for the various stages of growth. I have been in the construction industry for over 18 years, which allows me to bridge a major gap between builders and what growers actually need.

Education

University of Central Florida	Orlando, Florida
Bachelor of Science:	Business Administration
Major: Finance	Minor: International Business
Graduated May 2004	Member of Golden Key Honor Society

Licenses/Certifications

Florida Real Estate License

Infrared Training Center-Nationally Certified Thermographer

Professional Experience

THConsulting **2010-Present**
Owner

- Provide services to the rapidly growing medical cannabis industry from state and local application work and cultivation design to build outs and operational staffing and training
- Working with Denver Water and the Denver Department of Environmental Health to develop a best practice guide for commercial cannabis cultivation
- Application of thermal imaging to improve garden and building efficiencies
- Regular participant in control experiments to test various fertilizers on cannabis, both organic and synthetic
- Thousands of hours and dollars in product testing and product development specific to indoor cultivation and hydroponics
- Developed an integrated pest management program over 5 years of commercial cannabis cultivation, updating the program every few months for pests and diseases typical to cannabis, as new products and information become available

3D Cannabis Center **2013-2015**
Investor/Head Grower/Facility Manager

- Created an employee manual specific to the commercial cannabis industry
- Created a cultivation training manual for employees specific to indoor hydroponic systems with a focus on sanitation, grow medium preparation and production planning
- Streamlined inventory ordering and incorporated regular bi-weekly material deliveries reducing the inventory storage area and man hours associated with acquiring necessary cultivation materials
- Increased the indoor production/cultivation area by 100% in less than 10 months
- Increased production by over 300% in less than 12 months
- Increased staff from 5 to 35 employees in 8 months
- Increased sales from $30,000 to $300,000 per month in 8 months
- Responsible for working with the City of Denver's Building and Zoning Department in securing the 7th recreational license awarded in Colorado which resulted in America's first recreational sale

Colorado Alternative Medicine **2010-2013**
Head Grower/Facility Manager

- Hired as the first cultivation employee/manager with the full responsibility of the development of the cultivation department
- Developed commercial hydroponic systems designed for automation, man hour reduction and ease of operation
- Designed and built all production rooms throughout a multiple warehouse cultivation expansion
- Increased production by over 400% in a 2 ½ year period
- Created processes and procedures for daily operations and production planning
- Created training methods to organize and streamline production methods
- Trained management in equipment diagnostics and general system troubleshooting
- Performed evaluations, data collection and analysis of over 150 varieties of cannabis over a 3 year period

Absolute Property Managers **2008-2009**
Owner

- Managed and maintained residential and commercial properties
- Performed basic services all the way to whole house remodels
- Performed thermal energy efficiency evaluations on residential homes
- Incorporated use of the thermal camera to effectively provide condition monitoring of commercial electrical and mechanical systems

E & A Enterprises **2006-2009**
Service Technician

- Repaired and serviced restaurant equipment
- Repaired gas, electric, plumbing, and miscellaneous issues
- Maintained multiple T.G.I. Friday's restaurants in one of their largest markets
- Provided around the clock emergency repair work

O2HR Human Resources **2004-2005**
Account Executive

- Outside Sales- position was to seek out and obtain a new book of business through cold calls and creative marketing
- Customer Sales- provided after the sale service to maintain client base and improve on referral business

Construction Experience

Nationally Certified Thermographer **6 years**

- Scanned and identified heat losses and heat sources
- Scanned electrical systems to ensure safe operating conditions
- Performed air flow calculations
- Performed building energy efficiency evaluations and condition monitoring of mechanical systems

Restaurant Repair/Property Management/General Contractor **18 years**

- Commercial gas line repair
- Metal working/Fabrication experience
- Carpentry experience
- Plumbing experience
- Commercial electrical experience
- A/C & Ventilation experience

Donn M. Dennis, MD

Donn Dennis is the JS Gravenstein MD Endowed Professor of Anesthesiology at the University of Florida's Department of Anesthesiology. He currently teaches medical courses in anesthesiology, pharmacology, and experimental therapeutics. He is the Director of Nanomedicine and Co-Director at the Center for Nano-Bio Sensors. Dr. Dennis will serve as a medical doctor advocate for all the executive members of the company, with particular emphasis on cannabis research and development for patient use. An expert in the medical research field, Dr. Dennis received his education from three prominent establishments, completing his residency in anesthesiology and a research fellowship in cardiovascular pharmacology and electrophysiology at the University of Florida College of Medicine, finishing his internship at William Beaumont Hospital in Royal Oak Michigan, and receiving his Doctorate Degree from the University of Michigan in Ann Arbor.

Dr. Dennis's clinical interests include: translational research, nanomedicine, drug research and development. Within his role in the company, he will explore new ways to provide helpful patient and caregiver education, while researching new advances in the medicinal cannabis field. Dr. Dennis is a strong believer that education is a powerful way to initiate progressive changes in the world, including health and health care in our society.

Margaret Gedde, MD, PhD

Dr. Margaret Gedde is a Stanford-trained MD PhD pathologist and award-winning researcher who worked for years developing drugs in the pharmaceutical industry. In 2004, Dr. Gedde left that industry to open an alternative medical practice focused on holistic, supportive, non-pharmaceutical therapies that can offer large benefits to patients but are not accepted by conventional medicine. Currently, Dr. Gedde specializes in the use of cannabis to help patients get healthier and partake in a better quality of life.

Dr. Gedde has significant experiencing working with virtually all clinical services and therapeutic areas in hospital environments through consultations, nightly calls, examinations, and clinical rounds. As Chief Resident, she led morning resident rounds, organized didactic and journal club series, and was liaison to the administration, facilitating two-way communication between faculty and residents. She worked closely with patients, addressing resident complaints and practiced conflict resolution.

Working to benefit her patients, Dr. Gedde studied techniques by practitioners who used alternative methods including targeted nutritional therapy, therapeutic tissue cleansing, vibrational healing, herbal medicine, and bioidentical hormone therapy. Her clinics ultimately came to focus on the medical use of cannabis for her patients, offering individuals less risky therapy than any pharmaceutical in treatment of chronic pain, nausea and other conditions.

Jill Lamoureux

Jill Lamoureux is a nationally recognized cannabis business expert in Colorado with extensive experience in cultivation, manufacturing and distribution. Lamoureux was the only industry representative to serve on both the Colorado Department of Public Health and Environment and the Colorado Department of Revenue medical cannabis advisory committees. She also serves as a subject matter expert to BOTEC Analysis Corporation for Washington State. Lamoureux regularly consults to public and private clients on a wide variety of subject matter from operations and regulations to finance and due diligence.

Lamoureux has personally experienced the positive quality-of-life impact medical cannabis has on individuals and their families and has been an ardent patient advocate. Due to her first-hand experience with developing a newly regulated system in Colorado, Lamoureux understands the importance of addressing patient, industry, and regulator needs in an effective system.

Lamoureux has presented on cannabis operations, financing, and regulation in multiple venues including finance conferences, continuing legal education courses, law review panels, and most recently at RAND's public policy workshop. She earned her MBA from the University of Denver and has worked in small business start-ups and quasi-governmental entities. Lamoureux served as a municipal bond trustee, finance director, and treasurer for eight years before entering the medical cannabis industry. She served as the second Chair of the National Cannabis Industry Association. Lamoureux currently serves as the Chair of the Patient Focus Certification Review Board and as a member of the American Herbal Products Association Cannabis Committee. Lamoureux has presented on medical cannabis business topics and has taught CLE courses on rules and regulations nationally and in Canada.

As a former dispensary and cultivation owner and operator, she brings first-hand experience to her compliance work and procedures writing. Lamoureux has provided regulatory consulting for all three medical cannabis trade associations in Colorado and holds contracts with both legal and consulting groups providing compliance, application management, and writing services.

Jahan P. Marcu, Ph.D.

499 Maple St. #2
Brooklyn, NY 11225
215-828-9183
Rddirector@gsdiagnostics.com

EDUCATION:

Ph.D. Cell Biology, Temple University. "Novel Insights into CB1 Receptor Signaling and the Anabolic Role of Cannabinoid Receptors in Bone."
Bachelor of Science, Molecular Cell Biology, San Francisco State University, 2007.
Minor, Chemistry**,** San Francisco State University, 2007.
Minor, Speech and Communications**,** San Francisco State University, 2007

EXPERIENCE/ SCIENTIFIC TRAINING:

Director of Research and Development, Green Standard Diagnostics, CEO Beth McCauley, May 2013-Current

- **Current Focus:** Medical cannabis and herbal supplement regulation and consulting, auditing of medical cannabis operations for Patient Focused Certification program, method development and validation of quantitative analysis (Contamination, potency, and genetics) of medicinal plants, developing delivery systems for cannabinoids.

Graduate Student, Temple University School of Medicine, Department of Anatomy and Cell Biology, Center for Substance Abuse, Dr. Mary Abood. September 2008- May 2013.

- **Research Focus:** Presently involved in two research projects: 1) mutational analysis of the CB1 receptor and 2) investigating cannabinoid receptor signaling mechanisms in bone cells via CB1 and CB2 receptors.
- **Techniques Used:** PCR for generating plasmids with specific mutations, cell culture methods to create and maintain stable CB1 mutant cell lines, immunocytochemistry, radioligand binding assays, western blot analysis, isolation of stem cells from animals, and assays for determining the metabolic activity of bone.

Lab Manager & Technician, California Pacific Medical Center Research Institute, Dr. Dieter Gruenert May 2007-August 2008

- **Research Focus:** studying the cystic fibrosis transmembrane receptor and maintaining Dr. Dieter Gruenert's research program. This involved processing of material transfer agreements & reimbursement payments for cell lines, providing cell culture protocols & cell culture troubleshooting for laboratories, maintaining cell lines in culture for international shipping, maintaining an extensive cell line inventory, and routine characterization of the cell lines.

- **Techniques used:** Advanced and specialized cell culture techniques for human airway epithelial cells, basic culture techniques for stem and hematopoietic cells, qRT-PCR, and Mycoplasma detection.

Technician, California Pacific Medical Center Research Institute, Dr. Charles Cobbs
April 2008-August 2008

- **Research Focus:** Investigating the role of HCMV in neural stem cell oncogenesis, contributing critical information towards understanding the roles of this virus in glioma biology and a basis for the design of novel therapeutics targeting these tumors.
- **Techniques used:** Receiving and culturing primary brain tissue samples. Cell sorting for stem cell populations from primary brain tumors. DNA, RNA, and protein extraction from human brain tissue. Protein quantification and western blot analysis.

Technician, California Pacific Medical Center Research Institute. Mentor, Dr. Sean McAllister. July 2005-April 2008

- **Research Focus**: Investigating anticancer activity of synthetic and natural cannabinoids in brain cancer cell lines. Determining if synergistic inhibitory effects of cannabinoids, on cancer cells, are present using combinations of plant constituents.
- **Techniques Used**: Basic cell culture, MTT assay for analysis of cell proliferation, cell flow cytometry, Boyden Invasion Chamber Assay, and western blot.

Staff Research Associate II, Department of Diabetes and Endocrine Research**,** University of California San Francisco, Mt. Zion Campus. Principle Investigator Dr. Ira Goldfine. March 2005-August 2008.

- **Research Focus**: Maintaining a mouse colony. Investigating breast cancer pathology from the over expression of the human fetal insulin receptor in transgenic mice.
- **Techniques Used**: Plasmid Transformation, Polymerase Chain Reaction, DNA extraction, Harvesting organs from transgenic mice for whole mounts, paraffin embedding, and protein analysis.

Overseas Research Internship, University of Leiden, Holland. Principle Investigator**:** Dr. Arno Hazekamp. July 2006.

- **Research Focus:** Extraction, isolation, and molecular structure determination of plant compounds.
- **Techniques used:** Centrifugal Partition Chromatography, High-Performance Liquid Chromatography, Gas Chromatography-Mass Spectrometry, Thin Layer Chromatography, and Nuclear Magnetic Resonance

Independent Research Project, San Francisco State University. April 2003-December 2005. Supervisor: Dr. Pete Palmer

- **Research Focus**: Investigating a possible therapeutic applicability for ratios of active constituents on medicinal plants using Gas Chromatography-Mass Spectrometry and surveys.

Overview of Project:

- Conducted internet and library research on plant therapeutics
- Interviewed persons who regularly use plant-based medicine
- Developed experimental designs for compound specific quantification in plant extracts
- Attempted to correlate illness and symptomatic-specific applicability of compound ratios
- Knowledgeable in specific therapeutic values of different plants

PUBLICATIONS:

American Herbal Pharmacopeia, Monograph *Cannabis Inflorescence* Standards of Identity, Analysis, and Quality Control (2013) www.herbal-ahp.org.

Marcu, Jahan*, Christian, Rigel T.,*, Zielinski,Anne Horowitz Maxx P., Lau, Darryl, Moore, Dan H. Desprez, Pierre-Yves, Yount, Garret L., McAllister, Sean D. (2011) Cannabidiol enhances the inhibitory effects of delta9-tetrahydrocannabinol on human glioblastoma cell proliferation and survival. *J Mol Cancer Ther.*

Marcu, Jahan P., Shore, Derek, Kapur, Ankur, Trznadel, Megan, Makriyannis, Alexandros, Reggio, Patricia, and Abood, Mary E. (2013). Novel Insights Into CB1 Cannabinoid Receptor Signaling: A Key Interaction Identified Between EC3-Loop and TMH2. *J Pharmacol Exp Ther.*

Brailoiu, G. Cristina; Deliu, Elena; Marcu, Jahan; Abood, Mary; Brailoiu, Eugen. (2014) Differential Activation of Intracellular vs Plasmalemmal CB2 Cannabinoid Receptors. *British Journal of Pharmacology*

Shore DM, Baillie GL, Hurst DH, Navas F, Seltzman HH, Marcu JP, Abood ME, Ross RA, Reggio PH (2014). Allosteric Modulation of a Cannabinoid G Protein-coupled Receptor: BINDING SITE ELUCIDATION AND RELATIONSHIP TO G PROTEIN SIGNALING. *J Biol Chem*

Console-Bram, Linda*, Marcu, Jahan*, Abood, Mary (2012). Cannabinoid Receptors: nomenclature and Pharmacological Principles. *Prog Neuropsychopharmacol Biol psychiatry.*

Marcu, Jahan (2008-until Present) The Lab Bench (Quarterly popular science column published in West Coast Leaf Newspaper)

Marcu, Jahan (2005) An Interview with S.F.S.U. Professor Dr. Ramirez-Weber; The Discovery of a New Cellular Component in Drosphila. *IntersciMagazine* San Francisco State University's College of Science and Engineering magazine Vol. 8.#1.

*Both Authors contributed equally

PUBLICATIONS IN PROCESS:

Marcu, Jahan, Console-Bram, Linda, and Abood, Mary. Book Chapter: Current Cannabinoid Receptor Nomenclature and Pharmacological Principles in Endocannabinoid Regulation of Monoamines in Psychiatric and Neurological Disorders (Editor Van Bocksteale, E.)

AWARDS/GRANTS RECIEVED:

- Court Qualified Cannabis and Synthetic Cannabinoid Expert, Judge Renee Young, 2011
- 2005 Scholarship for Community Service from San Francisco State University
- 2005 and 2006 American's for Safe Access travel grants to attend research conferences in Europe and California.
- 2008 Temple University School of Medicine, Research Achievement Award
- 2009 Travel and research presentation award from the International Cannabinoid Research Society
- 2010 Travel award from the International Cannabinoid Research Society
- 2011 Travel award from the International Cannabinoid Research Society
- 2012 Travel award from the International Cannabinoid Research Society
- SFY10 *(*Abood, Mary) *The Anabolic Role of Cannabinoid Receptors in Bone.* 7/1/2010 – 6/30/2011. Commonwealth Universal Research Enhancement (CURE) Program. Under this Pennsylvania Department of Health established research program, research grants are awarded for clinical, health services, and biomedical research.
- 2013 American's for Safe Access Researcher of the Year Award

PROFESSIONAL AFFILIATIONS/ACADEMIC SERVICE:

Board of Directors, International Association for Cannabinoids as a Medicine, Member 2004-Present

International Cannabinoid Research Society. Member 2006-Present

President, Graduate Student Association, Temple University. August 2009-August 2011.

- Organized annual research days with guest speakers and poster presentations from graduate and medical students, and regular social events for graduate students. Other responsibilities included being an advisor to graduate school dean, giving presentations and fielding questions from prospective graduate students about Temple's graduate program, policies, and student life in Philadelphia.

Faculty, Master Class on Cannabis**,** University of Wageningen, Netherlands, Dr. Arno Hazekamp.Sept. 12th-17th, 2011

- Successful completion of the International Master's Course on Medical Cannabis involved meeting with the professionals behind the Dutch medicinal cannabis program, visiting a legal cannabis growing facility in Veendam, The Netherlands, visiting pharmacies that dispense medicinal cannabis, and learning to assess the cannabis at different stages of growth including forensic techniques for analyzing cannabis in a quality control laboratory.

- Additional Topics covered in his course include basic chemistry of cannabinoids and terpenes, quality control, clinical studies, and administration forms. By a combination of lectures, excursions, literature review and discussions, the course is a unique stepping stone to a more scientific understanding of cannabis as a medicine.

Senior Scientist, Co-Chair, Multidisciplinary and Scientific Advisory Board. Americans for Safe Access (ASA). Executive Director: Steph Sherer. 2005-present.

- Organizing and lecturing at a series of educational seminars on medical cannabis, cannabinoids, and endocannabinoids, contributing author on medical research materials, fundraising and volunteer work with HIV/AIDS and other terminally ill patients.

TEACHING AND TRAINING:

CME (Continuing Medical Education for Clinicians) Teaching Experience for the American Academy of Cannabinoid Medicine and the answerpage.com:
http://aacmsite.org/Default.aspx?tabid=104
www.theanswerpage.com

Student Mentoring: Megan Trznadel, B.A., Kirk Miller, B.S. (2010-2012)

- Undergraduate Students, Neuroscience Program, Temple University. Provided daily mentoring and supervision to these students, which resulted in submitting a co-authored publication and poster presentations at regional conferences.

Instructor/Co-Founder (2010-2011), Cannabinoid Discussion Group, Temple University

- A 1-credit course that is open to undergraduates, graduate, and medical students. Students and faculty take turns presenting published research articles or discussing recently generated data. Involved with organizing curriculum, recruiting students, inviting host/guest speakers, and giving background/introductory talks.

Morristown High School Science Academy Guest Speaker (2 times).

- Invited by the Program Director Jill Magdison to talk about cannabinoid research in a New Jersey high school. Also discussed the road to a science career, presented research, and answered questions about science careers from high school students

SCIENCE WRITING EXPERIENCE:

- Contributor to online CME material at theanswerpage.com, January 2014-Present,
- Research Associate, Editor at the American Herbal Pharmacopeia and Therapeutic Compendium. Cannabis Sativa Monograph, 2013. www.herbal-ahp.org. November 2011-Present.
- Online Editor, O'Shaughnessy's Journal of Cannabis in Clinical Practice, February 2012-Present,
- Editor/Writer, Sensible Science Blog, April 2010-Present.
- Medical Marijuana Writer/Journalist for Philadelphia Examiner, January 2010-Present.

Thomas McGinty

As the company's healthcare advisor, Thomas McGinty brings over twenty-five years of healthcare communications experience to the team. He will assist Chestnut Hill Tree Farm in creating educational programs for the Novia Derivative Products line. McGinty has three years of experience as an extractions and analysis chemist. Additionally, McGinty has three years of chemical analysis equipment service and sales experience. McGinty is an expert in pharmaceutical sales and industry networking, and will be a crucial asset to the company.

Mark J. Rice, MD

Mark Rice is an accomplished medical doctor who shall bring extensive experience in his field and fundamental guidance to the company's general operations and polices. Previously, Dr. Rice was a Professor of Anesthesiology and held the title of Chief of the Division of Multispecialty Adult Anesthesiology at Vanderbilt University, a prestigious private research university located in Tennessee. Currently he is an Associate Professor at the University of Florida College of Medicine's Liver and Transplant Anesthesiology Department. Dr. Rice's research interests include quality improvement, liver transplantation, noninvasive blood analysis, and reflective practice outcomes in medical education.

Dr. Rice is an inquisitive clinician with a passion for education as a power for change and improvement in the health care field. He completed his internship, residency, and research fellowship at the University of Wisconsin Hospital and Clinics Division. Over the past two decades, Dr. Rice has founded as directs several organizations including: Blue Ridge Medical, Inc., in Nashville, TN, Foviopticsc, Inc., in Lexington, Kentucky, as well as Foviopticsc, Inc., in Santa Clara, California where he also held Chief Medical Officer. Additionally, Dr. Rice served as Chairman in the Department of Anesthesiology at Johnson City Medical Center. In 2010, when the catastrophic earthquake hit Haiti, Dr. Rice responded to the international appeals for humanitarian aid, providing his medical services and care to a country in a time of crisis that desperately needed his efforts. While volunteering, Dr. Rice ran the operating room at Sacre Coere Hospital, Milot, Haiti, and performed anesthesia for earthquake victims. Upon his return to the U.S., he was awarded for the "University of Florida and Shands Haitian Relief Efforts," in Alachua Country, Florida.

Mr. John L. Shermyen

Mr. John L. Shermyen serves as the Executive Chairman and Chief Executive Officer of Ingenios Health Co. He brings more than twenty years of executive leadership experience to Ingenios Health and is recognized as a visionary for his entrepreneurial style and bold approach to business.

Shermyen serves as a Venture Partner at Hickory Ridge Capital LLC. He has been the Chairman and Chief Executive Officer of L&L Acquisition Corp. since July 2010. He founded RadioSoft, Inc., in 1994, and served as its President and Chief Executive Officer from 1994 to July 2009. He is the Founder of Logisticare Solutions, LLC and has been its Chief Strategic Officer since May 20, 2009. Mr. Shermyen served as the Chief Executive Officer and President and of Logisticare, Inc. He served as the Chief Strategy Officer for Providence Service Corporation from May 20, 2009 to December 31, 2009. He founded LogistiCare Solutions, LLC in 1987. He served as President and Chief Executive Officer of Logisticare Solutions LLC, a subsidiary of Providence Service Corp. from December 2007 to May 20, 2009. Additionally, Shermyen founded Charter LCI Corporation in 1994. He served as Chief Executive Officer and President Charter LCI Corporation since its inception and Chairman from 1999 to 2004. Shermyen founded Automated Dispatch Services Inc. and served as its Chief Executive Officer from 1987 to 1993. He introduced the capitated, full-risk broker model to state governments, health insurers and other health-related entities in the early 1990’s.

As an executive with more than twenty years of management experience, Shermyen is recognized as a visionary for his entrepreneurial style and bold approach to business. He served as the Chairman of the Board and Director of LogistiCare Solutions, LLC. In 2003, he was recognized with the Ernst & Young Entrepreneur of the Year Award ® in the Business and Technology Services Category for the Southeast region. Mr. Shermyen received his Bachelor's Degree in Geography and Computer Cartography in 1976 and Master's degree in Geography and Computer Cartography in 1979 from the University of Florida.

Josh Stanley

Josh Stanley is a leading medical cannabis entrepreneur and advocate working to advance the medical cannabis industry in the U.S. and throughout the world. Stanley brings to the company over eight years of experience working in the cannabis industry and additionally was one of the first individuals to open a medical cannabis dispensary in Denver, Colorado.

Stanley has been heavily involved in responsible cannabis reform and began Colorado's political action committee and 501c4, the Medical Marijuana Industry Group, which he co-chaired. In 2010, Stanley assisted in the drafting of House Bill 1284, the first bill of its kind to further define and establish Colorado's medical cannabis state regulatory structure through the Colorado Department of Revenue. The following year he co-authored House Bill 1043 and was responsible for writing the research and development portion of the bill. Additionally, Stanley has developed rules and regulations for the Colorado Department of Revenue's Medical Marijuana Enforcement Division as well as the rules and sat on the rules and regulations board for research and development.

Stanley has been co-credited with creating a non-psychoactive strain of the cannabis plant with low-THC and high-CBD content. This specialized breed of sativa variety of medical cannabis has proven to be highly beneficial for varying degrees of epilepsy in both pediatric and adult patients. Stanley's effort to help children patients restore their lives with high-CBD cannabis extracts made international headlines in 2013 and was prominently featured on Sanjay Gupta's highly acclaimed CNN documentary in March of 2014. In addition, Stanley worked with the National Geographic Channel, who tracked his observational research studies and patient successes with medicinal cannabis in Colorado.

In April 2012, Stanley and his five brothers co-founded the "Realm of Caring," a nonprofit organization, committed to promoting a higher-quality of life for Coloradans affected by debilitating conditions through the use of non-smokable forms of concentrated CBD cannabis oil. In 2014, Josh founded "Strains of Hope," a nonprofit dedicated to assisting principalities across the globe in the implementation of responsible rules and regulations of the cannabis industry and to provide further medical research of the cannabis plant as it pertains to a variety of illnesses and disease states.

Shannon Wilson

Shannon Wilson is the founder and owner of Colorado-based Mahatma Concentrates. The company's core belief is simple, to produce only the best, high quality cannabis extractions. This philosophy has resulted in Mahatma Concentrates being recognized through numerous awards including:

- First place in best concentrates in the 2013 High Times Cannabis Cup;
- Second place in best cannabis concentrates in the 2013 710 Cup;
- First place in the best overall champion at the Daba-Doo Invitational in Amsterdam in 2013 and;
- Second place in best concentrates at the Hemp Connoisseur Championship in 2014.

Wilson is an active member of the NCIA, CBA, and MIG. In addition, she is a founding member of Women Grow and currently serves as chairman for MIG's Concentrates Committee. Wilson offers valuable insight and expertise to the company, scaling a large manufacturing operation within a regulated environment successfully.

PROFESSIONAL LICENSING DISCLOSURE – EMPLOYEES AND CONSULTANTS

Employee/Consultant Statement – Professional Licensure Disciplinary Action
Attn: Office of Compassionate Use – Florida Department of Health

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Instructions – please initial the correct statement.

SLB I hereby attest that I have never received a professional licensure disciplinary action in any jurisdiction.

_____ I have received one or more professional licensure disciplinary actions. If initialed, please provide an explanation:

Susan L. Baumgartner
Signature

Susan L. Baumgartner
Printed Name

7/2/15
Date

Employee/Consultant Statement – Professional Licensure Disciplinary Action
Attn: Office of Compassionate Use – Florida Department of Health

Instructions – please initial the correct statement.

BB X I hereby attest that I have never received a professional licensure disciplinary action in any jurisdiction.

_____ I have received one or more professional licensure disciplinary actions. If initialed, please provide an explanation:

Signature

Brady Blake
Printed Name

7/6/15
Date

Employee/Consultant Statement – Professional Licensure Disciplinary Action
Attn: Office of Compassionate Use – Florida Department of Health

Instructions – please initial the correct statement.

DAG I hereby attest that I have never received a professional licensure disciplinary action in any jurisdiction.

_____ I have received one or more professional licensure disciplinary actions. If initialed, please provide an explanation:

Deborah A. Gaw
Signature

Deborah A. Gaw
Printed Name

7/2/15
Date

Employee/Consultant Statement – Professional Licensure Disciplinary Action
Attn: Office of Compassionate Use – Florida Department of Health

Instructions – please initial the correct statement.

_____✔ I hereby attest that I have never received a professional licensure disciplinary action in any jurisdiction.

_____ I have received one or more professional licensure disciplinary actions. If initialed, please provide an explanation:

_____
Signature

Sam Glucksman, DPM, CCA
Printed Name

7-02-15
Date

Employee/Consultant Statement – Professional Licensure Disciplinary Action
Attn: Office of Compassionate Use – Florida Department of Health

Instructions – please initial the correct statement.

KMP I hereby attest that I have never received a professional licensure disciplinary action in any jurisdiction.

_____ I have received one or more professional licensure disciplinary actions. If initialed, please provide an explanation:

Signature

Kristopher Palmer
Printed Name

7-2-15
Date

Employee/Consultant Statement – Professional Licensure Disciplinary Action
Attn: Office of Compassionate Use – Florida Department of Health

Instructions – please initial the correct statement.

✓ I hereby attest that I have never received a professional licensure disciplinary action in any jurisdiction.

_____ I have received one or more professional licensure disciplinary actions. If initialed, please provide an explanation:

Signature

ROBERT D. WALLACE
Printed Name

7/1/15
Date

EMPLOYEE POLICIES

EMPLOYEE HYGIENE

The manufacture of products in accordance with cGMP requires that employees engaged in the manufacture, processing, packing, or holding of medical cannabis products wear clean clothing appropriate for the duties they perform. Protective apparel, such as head, face, hand and arm coverings, will be provided to employees and worn as necessary to protect products from contamination. Employees will be trained and required to practice good sanitation and health habits.

Any employee that demonstrates apparent illness or open lesions that may adversely affect the safety or quality of a product will be excluded from direct contact with components, product containers, closures, in-process materials and finished products. All personnel will be instructed to inform their supervisor of any health conditions that may have an adverse effect on a product. The company's management will be trained in identifying illnesses.

SAFETY

The company values employee and patient security and safety above all other operating principles. As a producer of medical cannabis products, the company is responsible for distributing uncontaminated, effective, consistent, and safe medical cannabis products to qualified patients. The Directors of Cultivation, Manufacturing, and Quality Assurance are responsible for the development and implementation of policies and procedures that adopt the safety of all the company's stakeholders as the foremost concern.

Each Director will identify and mitigate unit-specific safety considerations. Cultivation facilities have a high risk for electrical hazards, low-toxicity pesticide, and mold contamination. The Directors, in coordination with the Facilities Manager, will schedule regular infrastructure and equipment maintenance in order to reduce fire risk and other potential hazards. Other than electrical hazards, few exposures in a cultivation facility are expected to cause significant exposure risks. All manufacturing employees will receive function specific safety training and comply with all documented safety policies and procedures as a condition of employment.

EMERGENCY PREPARATION

The Manufacturing Director will post and maintain an emergency contact list in several areas of the facility. All cultivation employees will be properly trained in incident response. Material Safety Data Sheets (MSDS) for all chemicals used in the cultivation facility will be organized, accessible to all cultivation employees, and placed available for review by any employee or visitor.

FIRE SAFETY

Flammable materials will be stored in a fire locker and properly labeled for first responder identification. All areas of egress will be properly signed in accordance with NFPA 704 standards. The facility will comply with all local fire codes. Fire extinguishers will be maintained annually. All cultivation employees will be properly trained in fire prevention and mitigation measures.

PERSONAL PROTECTIVE EQUIPMENT (PPE)

The Manufacturing Director will implement and maintain the PPE program. The program will be compliant with OHSA and EPA standards and address:

- Hazards present;

- Selection, maintenance, and use of PPE;
- Training; and
- Monitoring.

Manufacturing employees will be provided appropriate personal protective equipment and training, and will be trained in decontamination procedures. Employees are required to wear protective clothing and equipment as indicated by their OCU's safe work procedures. These procedures will specifically indicate when, where and what types of equipment are to be worn. The Manufacturing Director will perform risk assessments of all activities. The assessment will evaluate the types of equipment and clothing that protect against damage to eyesight or hearing, dust or chemical inhalation or ingestion, skin or bodily exposure to caustic or toxic chemicals, and falling objects. Standard PPE required for all manufacturing employees includes:

- Accessible eye wash stations with sufficient quantities of potable water.
- Uniforms with some level of fire resistance.
- Chemical resistant gloves.
- Boots with water resistance and slip protection.
- N-95 or P-100 disposable respirators.
- A full-face air-purifying respirator with a minimum of a P-100 filter, fitted by a qualified professional, is required for employees with beards or performing substance spray applications.
- Tyvex coveralls for employees performing substance spray applications.

CHEMICAL SPILL RESPONSE

All cultivation employees will be appropriately trained on spill response. Every employee is responsible for participating in spill response activities. A fully stocked spill kit will be maintained in the cultivation facilities. Areas with high spill risk will be stocked with a mobile spill kit for immediate mitigation.

WORKPLACE SAFETY

Managers will include workplace safety training for new employees with annual updates. This general safety training will include a review of:

- Personnel accident reporting and investigation policies
- Fire prevention and response plans
- Materials handling and hazard communications policies, including maintenance of material safety data sheets (MSDS)
- Personal protective equipment policies.
- Emergency contacts.

EMPLOYEE TRAINING REQUIREMENTS

The company's staff will be assisted by the company's expert advisors during start-up operations. The employee acquisition process is detailed along with procedures for skill-set assessments, terminations, and transitions. The company's policies dictate that no employee or consultant may work on-site prior to receiving a Level 2 background check and orientation training, or when any required critical training is eight weeks or more past due after employment.

All processing employees will receive employee manuals prior to employment. The employee manual provides in-depth training for cultivation policies and procedures. The Manufacturing Director is responsible for ensuring that each employee has received, read, and acknowledged their understanding of the material covered in the employee

manual. All processing facility employees will be trained by the Manufacturing Director and will be required to continually demonstrate a working knowledge of training materials as a condition of employment. All employees are required to have a working knowledge of FDA production standards established by the Manufacturing Director for medical cannabis products manufacturing.

Any changes to the processing SOPs will be communicated to all processing facility employees and an acknowledgement of understanding will be documented for each employee. The company is dedicated to training all employees to excel in their position. It is policy to ensure that all employees receive professional and appropriate training on compliance with state law, the therapeutic use of medical cannabis, safety, security, incident management, and diversion and theft prevention. No employee may work on-site prior to receiving orientation training or when any required critical training is past due. All cultivation employees will receive training on the cultivation methods and products employed by the company. The Manufacturing Director will ensure that prior to beginning work in the cultivation facility, employees receive full training on:

- The methods of production used by the processing facility;
- The gases and chemicals used by the processing facility;
- Methods for recognizing critical hazards in processes and the signs of contamination in medical cannabis products;
- The use of batch production records and;
- The safe handling of equipment, including, without limitation, extraction and separation equipment, analytical equipment, packaging equipment, etc.

The Manufacturing Director with oversight by the Chief Operating Officer will approve third-party training and certifications for cultivation staff. Training and audit programs authorized for use by management at this time include:

- cGMP for Pharmaceutical Quality Control: Center for Professional Advancement.
- Food Safety First! is an approved food worker training program, meeting all requirements of Chapter 509 of the Florida Administrative Code. 360training.com and Learn2Serve have partnered with Environ Health Associates, Inc., the sole owner of the course and the approved vendor for the program.
- International Food Protection Training Institute: FDA Pest Control in Food Establishments, Plumbing Controls for Commercial Food Establishments, and HACCP trainings.

AMERICANS FOR SAFE ACCESS ANNUAL ON-SITE TRAINING

The company will host an on-site annual training for employees in all units. The training developed by the non-profit is required in the District of Columbia and approved in multiple states. The core curriculum addresses the health, safety, and welfare of patients as the foremost obligation of a medical cannabis provider.

Chestnut Hill Tree Farm, LLC has entered into a letter of intent with Americans for Safe Access to provide annual certification and on-site training services. Our advisor, Jill Lamoureux, designed the certification program to evaluate a cannabis business operation's compliance with the American Herbal Products Association health and safety recommendations to regulators for best practice. Jahan Marcu, PhD also serves as an auditor for the program. Both advisors will recuse themselves from the audit process.

The onsite training will occur once per year and be mandatory for all employees and management. The training curriculum currently encompasses the following PFC Required Trainings:

A. CORE CANNABIS CERTIFICATION (CCC): The CCC training provides the foundation for PFC required trainings and is a prerequisite for additional training. All PFC auditor trainees are required to successfully complete the CCC. The CCC courses address the following topics.

1. CANNABIS RESEARCH AND CLINICAL DATA: Find out what research is revealing about the therapeutic potential of cannabis, and learn what types of pain, disorders and diseases this plant potentially relieves. Clinical trials and their importance are also covered. Finally, see what groundwork has been laid for future cannabis research.
2. THE ENDOCANNABINOID SYSTEM: This module gives a brief history of opioids and cannabinoids, and explains how the endocannabinoid system was discovered. The workings of the endocannabinoid system as well as the physiological role of endocannabinoids are also discussed.
3. CANNABIS 101: Gain a fundamental understanding of the cannabis plant by learning the varieties of cannabis and their uses, the most common cannabinoids, the effects of cannabis, and the difference between psychoactive and non-psychoactive cannabinoids.
4. CANNABIS-BASED MEDICINES: Cannabis-Based Medicines covers the cannabis pharmaceuticals that are currently available. It also takes a look at cannabis extracts and concentrates and how they might be used. The module concludes with a section on cannabis edibles and a brief discussion about how cannabis might be incorporated into food and drink.
5. QUALITY OF CARE: Targeted at dispensary workers, this module covers customer service, how to identify and handle medical emergencies, and patient education. A discussion of the Patient's Bill of Rights finishes the module.
6. KNOW YOUR RIGHTS: This module prepares you for interactions with federal law enforcement (FLE). Know what to do in event of detainment or arrest as well as how to answer questions from FLE. Finally, understand when Miranda warnings apply.
7. RAID PREPAREDNESS: Cannabis businesses are at risk for being raided. Know what to do should this happen. In this module, learn what operations should be followed during a raid. Discover what legal and logistical preparations should be taken as well as how to activate supporters. Knowing how to handle those inside and out- side of the raided facility is also an important consideration. Finally, learn what steps should be taken after a raid is over.
8. RUNNING A SAFE BUSINESS: Dispensaries, growers, and processing centers alike need to take precautions to ensure the safety of their product. Learn how to spot contaminants and maintain safe and sanitary conditions. Security considerations will also be discussed. The module concludes with tips on neighborhood and community relations.

B. NATIONAL STANDARDS COURSES: The National Cannabis Standards Training(s) are designed to educate attendees about the particulars of compliance with the discipline specific AHPA and AHP guidelines and are available in four cannabis industry disciplines. PFC auditors are required to successfully complete the National Standards Course work in the discipline(s) that the auditor will be working in. For example, all auditors who will be auditing cultivation and/or processing facilities must successfully complete the National Standards Course in Cultivation and Processing.

1. CULTIVATION AND PROCESSING: Based on the AHPA Recommendations to Regulators for Cultivation and Processing operations, this training applies to all types of cultivation operations: outdoor, greenhouse, and indoor cultivation facilities. This training is designed to provide learners with the skills necessary to implement Good Cultivation Practices including pesticide guidance, facility requirements, water resource management, recordkeeping, product safety recall systems, adverse event recording, and information disclosure. This course also explores best practices and safe handling procedures for operations that provide post-harvest processing of cannabis.
2. MANUFACTURING, PACKAGING, LABELING AND HOLDING: Designed for individuals engaged in the manufacturing of cannabis and cannabis-derived products,

this training is designed to provide learners with the tools necessary to comply with General Management Practices including general personnel responsibility and safety, physical condition of the plant and surrounding grounds, manufacturing controls, packaging, holding and labeling controls, cannabis material acquisition, inventory and recordkeeping, fielding and documenting complaints and product returns, product safety recalls, and adverse event recording.

3. LABORATORY ANALYSIS: Designed for individuals performing laboratory analysis of cannabis, cannabis-derived products, and hemp products, this course has been developed to educate learners on good laboratory practices and focuses on facility security, sample handling and disposal, data management, personnel safety and hygiene, and reporting activities that may be unique to laboratories analyzing cannabis, cannabis- derived products, and hemp samples.
4. DISTRIBUTION: This comprehensive training is designed to provide participants with the skills necessary to implement Best Management Practices relating to the distribution of cannabis and cannabis-derived products directly to compliant individuals through storefront operations, delivery services, direct-from-garden operations, and growing co-op operations. This training includes information regarding personnel policies, facility security, product acquisition, record keeping, customer policies, implementable product safety recall systems, and adverse event recording.

C. PESTICIDE GUIDANCE AND INTEGRATED PEST MANAGEMENT (IPM): This in-person course is required for all auditors who will be inspecting cultivation and processing facilities. During this course, auditors are familiarized with key definitions pertaining to pesticides and learn how to properly read a pesticide label. The course will also explore the importance and function of tolerance thresholds, major chemical families, Restricted Entry Intervals (REI's), and Personal Protective Equipment (PPE's) as well as employee safety and employer responsibilities. The second portion of this course covers the key components to successful IPM.

D. SUSTAINABILITY, SANITATION, AND RECORD KEEPING FOR CULTIVATION FACILITIES: This course is required for all PFC auditors engaged in cultivation and processing inspections. Designed to help cultivators reduce their impact on the environment, this course provides tools for reducing the carbon footprint of cultivation operations as well as the use, recycling and reuse of mediums. In addition, this course discusses appropriate nutrient use, the consequence of mined and imported materials, and the proper storage of chemicals. Water sources, use, storage and reduction techniques are also addressed in this course as is the proper tracking of materials used during the cultivation process.

E. REPRESENTATIVE BATCH and LOT SAMPLING - QA/QC: This course is required of all PFC auditors regardless of the discipline(s) they will be auditing. During this in-person course, learners will be provided with an overview of paradigm shifts and global perspective relating to QA/QC. Details on developing and implementing Quality Assurance (QA) and Quality Control (QC) systems will be discussed including method validation and General Manufacturing Practices (GMP's) as they relate to QA/QC topics.

REQUIRED TRAINING SCHEDULE

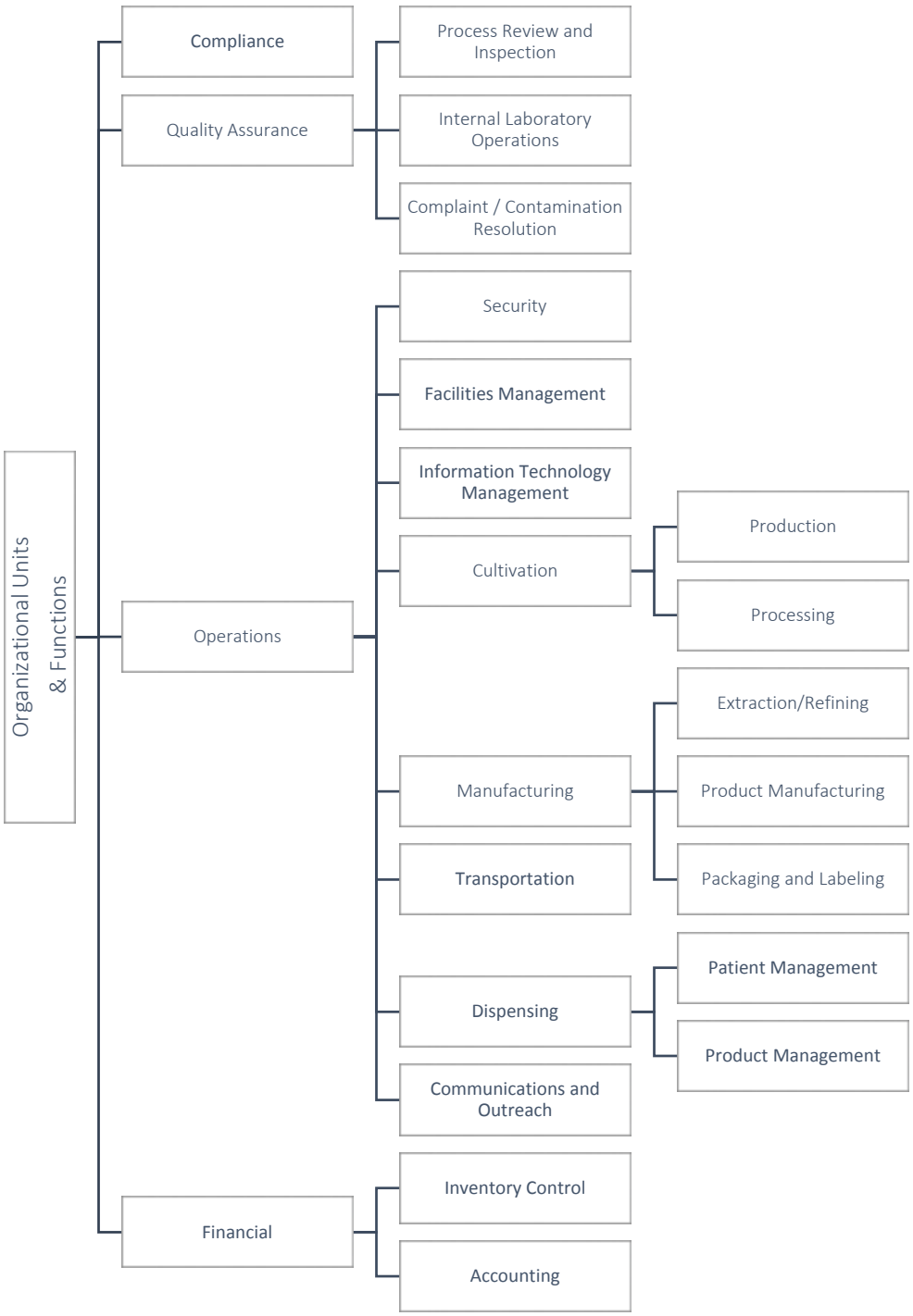
TRAINING MATRIX				Chief Operating Officer	Controller/Bookeeper	Inventory Manager	Admin Assistants (All Units)	Medical Director	Dispensary Manager/Asst Mgr	Patient Associate	Dispensary Asst.	Cultivation Manager/Asst Mgr	Processing Manager	Cultivation Technician	Harvest Technician	Manufacturing Manager/Asst Mgr	Extraction Manager/Technician	Production Manager/Technician	Packaging Manager/Technician	Operations Manager	Quality Control Unit	Security Manager/Officer	Facilities Manager	Transportation Manager
Training Module	**Hrs.**	**No.**	**Trainer**	**ADMIN**				**DISPENSARY**				**CULTIVATION**				**PRODUCTION**				**OPERATIONS**				
Train the Trainer	16.0	1/yr	3rd Party	x		x		x	x			x				x					x			
*New Employee Orientation	8.0	1x	Unit Mgr		x	x	x	x	x	x	x	x	x	x	x	x	x	x	x	x	x	x	x	x
Medical Cannabis Science	4.0	1/yr	3rd Party					x	x	x	x	x		x		x	x	x			x			x
*Production Safety	2.0	2/yr	Production Mgr					x									x	x	x	x				
Patient Relations	2.0	2/yr	Dispensary Mgr				x	x		x	x										x			x
Monthly Unit Meetings	2.0	12/yr	Unit Mgr		x	x	x	x		x	x		x	x		x	x	x	x	x		x	x	x
Medical Cannabis Science Update	2.0	1/yr	3rd Party					x	x	x	x	x				x	x	x			x			x
Compliance, Regulation, and Law	2.0	1/yr	COO		x	x	x	x	x	x	x	x	x	x	x	x	x	x	x	x	x	x	x	x
Transportation	1.5	1/yr	COO			x		x	x	x	x	x								x		x		x
*Cultivation Safety	1.0	2/yr	Cultivation Mgr									x	x	x	x				x	x				
*Cultivation Security	1.0	2/yr	Cultivation Mgr			x						x	x	x	x				x	x		x		
*Dispensary Security	1.0	2/yr	Dispensary Mgr			x		x	x	x	x									x		x		
*Confidentiality	1.0	1/yr	HR	x	x	x	x	x	x	x	x	x	x	x	x	x	x	x	x	x	x	x	x	x
Emergency/Incident Management	1.0	1/yr	COO			x	x	x	x	x	x	x	x	x	x	x	x	x	x	x	x	x	x	x
Inventory Control and Diversion Prevention	1.0	1/yr	Inventory Mgr		x		x	x	x	x	x	x	x	x	x	x	x	x	x	x	x	x		x
Recordkeeping	1.0	1/yr	GM		x	x	x	x	x	x	x	x	x			x	x	x	x	x	x	x		x
Product Handling and Sanitation	1.0	1/yr	GM			x		x	x	x	x	x	x	x	x	x	x	x	x		x			x
*Dispensary Safety	0.5	2/yr	Dispensary Mgr					x	x	x	x									x				

*Required prior to working on site.

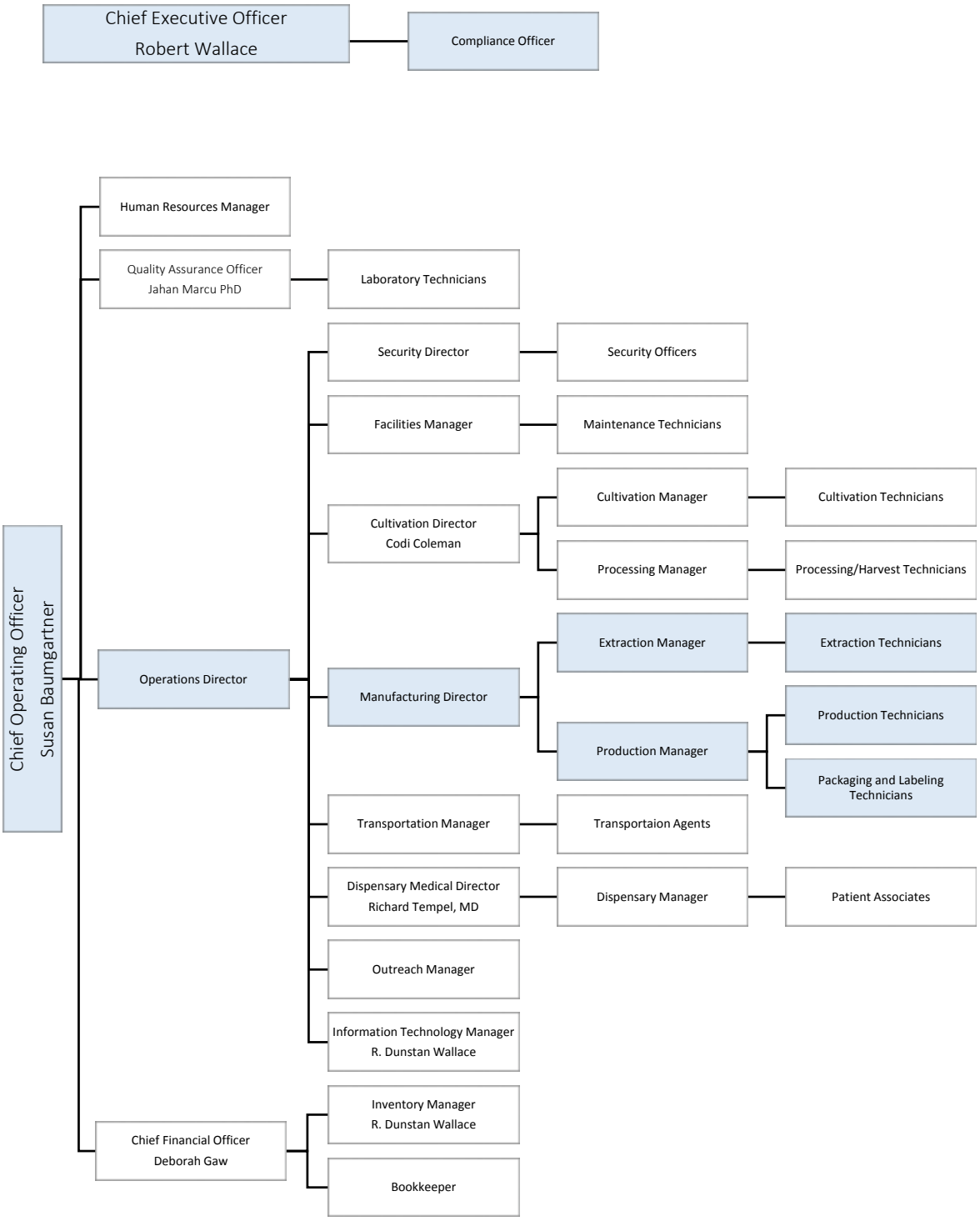
Part 3.B.3.i. An organizational chart illustrating the supervisory structure of the cultivation function of the proposed Dispensing Organization

FUNCTIONAL OVERVIEW

The company is structured by operating functions. The chart below illustrates the units of division.



PROCESSING UNIT



Part 3.B.3.i. An organizational chart illustrating the supervisory structure of the cultivation function of the proposed Dispensing Organization

REDUNDANCY FOR KEY PERSONNEL

The company's staffing plan contemplates cross training for all key personnel. This integrated organizational structure allows the maintenance of the company's high operating standards even when key personnel are absent. Each operating unit will always ensure that a minimum of two staff members are capable of managing the highest functions of the unit.

RETENTION OF EXPERTS

Multiple industry experts have already been retained by the company as advisors for the planning and application process. These experts will remain engaged with the company during start-up operations. They provide professional back-up options for all cultivation functions in the organization. These advisors have allocated time to assisting the company and will be available in any emergency scenario to provide operational functionality until normal operations are restored. As these experts designed the company's operating model, they are the best solution during stressed operating periods.

CONTINGENCY PLANNING

The loss of one key employee can cripple the operation. The Chief Executive Officer and Chief Operating Officer will develop contingency plans for human resource risks such as death, disability, family leave, or turnover. The plan will help to reduce the company's risk of operational failure.

PLAN ELEMENTS

The company's human resource contingency plan addresses several components. The plan seeks to make it easier to replace departing personnel and to reduce the chance of their leaving. The Chief Operating Officer will provide an annual risk-assessment that:

- Determines potential human resource risks;
- Ranks the probability any given risk will occur; and
- Estimates the severity of the impact on the company.

The annual business impact analysis evaluates how losing a given employee will affect operations and the company's finances. The plan will identify risk mitigation strategies for the identified risks.

RISK MANAGEMENT

Chestnut Hill Tree Farm will manage human resource risks by retaining, reducing, avoiding, or transferring them. Human resource policies reduce the probability of a key personnel from electing to resign. Strict protocols addressing employee benefits and personnel policies provide key employees with an understanding of their roles and responsibilities reducing job dissatisfaction.

TRANSFERRING RISK

Key person insurance transfers some key personnel risk. The policy protects against the death or disability of key employees. The company will use the proceeds from these policies to keep the company running until a replacement is identified and trained. The company will carry key employee insurance for the head of each operating

unit. The policy will allow the company to immediately bring in consultants and industry experts to help manage and recruit and train a replacement so that no operational interruptions occur.

STAFF ACQUISITION PROCESS

The Human Resources Manager will coordinate with the Chief Operating Officer to acquire all necessary staff including key personnel. The acquisition process may vary depending on the vacant position and any special circumstances including Chief Executive Officer approval for a direct non-solicited hire. The acquisition process is managed by the Human Resources Manager and typically involves the following:

- Identification of need.
- Job classification and job description preparation.
- Solicitation of the vacant position utilizing the methods that best fit the position including, but not limited to:
    1. Internal posting,
    2. Partner posting (consultants, non-profit partners, vendors, etc.),
    3. External posting,
    4. Temporary staffing agency; or
    5. Executive search firm.
- Reviewing resumes and required job applications for qualified candidates including those with relevant experience and those with complementary skills and a strong potential for growth.
- Performing and recording reference checks on qualified candidates including verification of address, education, and former and current employment.
- Recording of information from former supervisors on the candidate's performance if available.
- Scheduling first interviews.
- Scheduling second interviews (with strong candidates) with the direct supervisor.
- Delivery of an offer letter to the first choice candidate (as determined by the direct supervisor).
- Performing a Level 2 criminal background check on the selected candidate to determine eligibility and to identify any other possible disqualifying items.
- New hire orientation and training.
- Completion of the probationary period.

CONSULTANT ACQUISITION

Consultants may be utilized when approved by the Chief Executive Officer. All consulting contracts will contain suitability provisions and require compliance with all applicable laws and regulations. Consultants will receive and acknowledge the company's Employee Handbook and Standard Operating Procedures and bear the same responsibilities as employees of the company. Consultants may be used where third-party services are desired for separation of duties (i.e. IT, accounting, and audit and compliance).

DISQUALIFYING ITEMS AND ITEMS OF CONSIDERATION

Chestnut Hill Tree Farm will not hire any person that is not eligible. All staff will be 21 years of age or older. The Human Resources Manager will not employ anyone who will come in contact with or handle medical cannabis who has been convicted of any theft, violent crime, or felony of sale or possession of drugs, narcotics, or controlled substances. Other items discovered through the reference check process may be considered when making a hiring decision including, but not limited to:

- A history of theft, acts of violence, or negligence;
- Unverifiable resume or application statements;
- Negative reference checks or inability to obtain a positive reference from any former employers;

- Lack of stability in work history or residence;
- Employment with any independent laboratory providing services for the operation or physician's office providing medical cannabis patient certifications.

DISCRIMINATORY PRACTICES

Chestnut Hill Tree Farm does not discriminate in hiring or operating decisions. All managers and supervisors will comply with all EEOC guidelines when managing staffing issues. No policy or procedure implemented by the company may lead to discrimination based on or conflict with laws regarding:

- Race
- Height or Weight
- Credit Rating or Economic Status
- Religious Affiliation or Beliefs
- Citizenship
- Marital Status, Number of Children
- Gender
- Arrest or Conviction unless in a sensitive position
- Security/Background Checks For Certain Religious or Ethnic Groups
- Disability
- Medical Questions & Examinations

WORKER SAFETY AND PROTECTION

The company's safety policies detail procedures for ensuring the implementation of best safety practices at all times and in accordance with Occupational Safety and Health Administration ("OSHA") guidelines throughout all facilities and operations. The systematic guidelines established will be strictly enforced, as the safety of employees and the public is the company's foremost business consideration. All employees will comply with all applicable safety regulations as listed in the Standard Operating Procedures ("SOPs") as a condition of employment. Safety training will be provided as often as necessary and annually at a minimum.

Employer and employee responsibilities are addressed in the SOPs and a designated Safety Coordinator is named as the primary contact for safety-related matters. Regular required safety inspections are required along with respirator use and training procedures.

All facilities will be inspected quarterly by the Facilities Manager to identify potential hazards using the OSHA Self-Inspection Checklist to prevent hazardous material and chemical incidents that could result in injury and/or illness to any employee or visitor. It is established that requirements of OSHA's Hazard Communication standard will be met and unit managers are assigned responsibility for conducting job specific hazard training on chemicals used by their employees. After attending training, each employee will sign a form to verify that he or she attended the training and understands the company's policies on hazard communication.

Copies of Material Safety Data Sheets ("MSDS") for all hazardous chemicals to which employees may be exposed will be available on the intranet and by hard copy in each chemical storage area of the operating unit in a designated MSDS binder. Sample documents include accident report forms, a safety rule violation notice, and the OSHA Self-Inspection Checklist.

Safety rules addressed include those relevant to accident and hazard reporting, drug and alcohol use, driving, work-related injuries and the required use of Personal Protective Equipment ("PPE"). Enforcement measures and disciplinary actions detailed are to be implemented in response to safety rule violations established herein. All emergency situations including chemical spill response will be handled by local emergency response agencies in accordance with the company's emergency and incident response SOPs. Additional measures serve to establish procedures for injury claims and policies related to workers' compensation and benefits provided.

RESOURCES

Occupational Safety and Health Administration
Pharmaceutical Quality/Manufacturing Standards (cGMP) Guidances

CULTURE OF SAFETY

It is the policy of the company that the safety of its employees and the public is the company's foremost business consideration. The prevention of accidents and injuries takes precedence over expedience. In the conduct of the company's business, every attempt will be made to prevent accidents from occurring. The company requires that its employees, as a condition of employment, comply with all applicable safety policies and procedures.

The designated Safety Coordinator is the primary contact for safety-related matters. All employees will receive an orientation of the safety policy and rules upon initial employment, and are required to bring to the attention of their unit manager or the Safety Coordinator any unsafe or non-compliant conditions or practices. Managers will

communicate these concerns to the Safety Coordinator, who will respond to reports within twenty-four hours. Safety training will be provide as often as necessary and annually at a minimum.

Senior management will be actively involved with employees in establishing and maintaining an effective safety program. The Chief Operating Officer, Safety Coordinator and other members of the management team will participate with all dispensary employees in an ongoing safety program.

EXTRACTION SAFETY AND TRAINING

The company is fully aware that exposure to solvents can be dangerous. The design of the facility considers the requirements for extraction processes. The extraction area is well ventilated and separate from all other processes. The extractor will employ a hood vent over the exit port so that excess CO_2 and volatile organic matter is vented properly. The volatiles will be vented through a carbon column so that the air emerging is clean and VOC free. The carbon cartridge will be replaced at quarterly intervals. The processing area will have a CO_2 monitor as a safety precaution that will sound when the level of CO_2 in the room reaches an unsafe level. In the event of a leak, the pressure will no longer be maintained by the Waters system and the pump will shut off. If the pressure exceeds 5000 psi, the system would leak or the limit in the software would shut down the system. The pump is maintained monthly with new seals and all maintenance events are recorded.

All employees hired to work in the extraction laboratory must wear proper safety gear, such as goggles, gloves, and closed-toe shoes. Any employee that is not wearing suitable safety attire will not be granted entrance into the lab. Any employee that witnesses a potential safety hazard must immediately report of the incident to the Quality Assurance Officer as a condition of employment. No visitors are allowed inside the extraction laboratory under any circumstances, unless required by regulation or law.

The Manufacturing Director must reeducate all employees regarding safety and new procedures at least biannually. The operation will provide all employees with the current protective safety equipment required by the Material Safety Data Sheets (MSDS) for handling materials such as solvents and gases. The laboratory facility will be equipped with at least one emergency eye flushing station that will be readily accessible to all employees handling dangerous chemicals and materials. The Quality Assurance Officer shall closely follow the guidelines set by US Pharmacopeia as to the safety of solvent levels that should be applied to extraction methods.

All employees must be trained how to properly disengage all extraction equipment in an emergency, if it is safe to do so. Employees will be required to review all extraction equipment manufacturers' training manuals and comprehend all emergency and incident response protocols. The Extraction Manager will follow a general extraction safety checklist to ensure a safe extraction environment for all employees.

The Safety Coordinator must map a safe escape route out of the facility in the event of any emergency. All employees must be trained how to execute all safe escape routes in the event of any emergency. For safety purposes, there shall be no visitors permitted into the extraction lab. Visits from state and authorized government officials are permitted pursuant to current state laws and regulations.

COMPANY RESPONSIBILITIES

The Chief Operating Officer in coordination with unit managers will:

- Provide a safe workplace.
- Facilitate monthly safety meetings.
- Provide safety and health education and training.
- Annually review and update workplace safety rules.

EMPLOYEE RESPONSIBILITIES

All employees will:

- Report all unsafe conditions.
- Immediately report all work-related injuries.
- Wear the required personal protective equipment.
- Abide by the organization's safety rules at all times.

SAFETY COORDINATOR RESPONSIBLITIES

It is the policy of the company to assign a Safety Coordinator to oversee all safety related matters and chair the company's safety committee. The Chief Operating Officer will designate a Safety Coordinator for the company who will be the primary contact for safety-related matters.

Employee Reporting

All employees will receive an orientation to this company's safety rules upon initial employment and will bring to the attention of to their unit manager any unsafe conditions or practices. Unit managers will communicate these concerns to the Safety Coordinator, who will respond to these concerns within twenty-four hours.

Responsibilities of the Safety Coordinator

The Safety Coordinator is responsible for overseeing implementation of the organization's safety program. The Safety Coordinator will:

- Maintain compliance with state mandated rules including current poster provisions and forms available to employees.
- Annually review organization safety policy and rules.
- Maintain accurate records and annually report the results of workplace accident and injury trend analysis.
- Recommend actions to reduce the frequency and severity of accidents and illnesses.
- Integrate safety into the day-to-day activities of all employees.
- Coordinate the new employee orientation and safety training programs.
- Assist the organization in compliance with government standards concerning safety and health.
- Assist unit managers with accident investigation.
- Conduct and record periodic safety inspections to identify unsafe conditions and practices and to determine remedies.
- Ensure all employees are properly trained on hazardous conditions in their unit and that all termination points for gas, electric and water service are clearly marked and known to employees.
- Make recommendations to the Chief Operating Officer on matters pertaining to safety.

Inspections Required

The Safety Coordinator or his or her designee will inspect all the company facilities quarterly to identify potential hazards using the OSHA Self-Inspection Checklist attached. A responsible party will be assigned to correct all hazards as soon as possible. If the hazard is extreme, the inspector in his or her discretion may contact the unit manager to terminate operations until corrected. Per OSHA recommendations, inspections will cover:

- Processing, Receiving, Shipping and Storage - equipment, job planning, layout, heights, floor loads, projection of materials, material handling and storage methods, training for material handling equipment.
- Building and Grounds Conditions - floors, walls, ceilings, exits, stairs, walkways, ramps, platforms, driveways, aisles. Housekeeping Program - waste disposal, tools, objects, materials, leakage and spillage, cleaning methods, schedules, work areas, remote areas, storage areas.

- Electricity - equipment, switches, breakers, fuses, switch-boxes, junctions, special fixtures, circuits, insulation, extensions, tools, motors, grounding, national electric code compliance. Lighting - type, intensity, controls, conditions, diffusion, location, glare and shadow control.
- Heating and Ventilation - type, effectiveness, temperature, humidity, controls, natural and artificial ventilation and exhausting.
- Machinery - points of operation, flywheels, gears, shafts, pulleys, key ways, belts, couplings, sprockets, chains, frames, controls, lighting for tools and equipment, brakes, exhausting, feeding, oiling, adjusting, maintenance, lockout/tag out, grounding, work space, location, purchasing standards.
- Personnel - training, including hazard identification training; experience; methods of checking machines before use; type of clothing; PPE; use of guards; tool storage; work practices; methods for cleaning, oiling, or adjusting machinery.
- Hand and Power Tools - purchasing standards, inspection, storage, repair, types, maintenance, grounding, use and handling.
- Chemicals - storage, handling, transportation, spills, disposals, amounts used, labeling, toxicity or other harmful effects, warning signs, supervision, training, protective clothing and equipment, hazard communication requirements.
- Fire Prevention - extinguishers, alarms, sprinklers, smoking rules, exits, personnel assigned, separation of flammable materials and dangerous operations, explosion-proof fixtures in hazardous locations, waste disposal and training of personnel.
- Maintenance - provide regular and preventive maintenance on all equipment used at the worksite, recording all work performed on the machinery and by training personnel on the proper care and servicing of the equipment.
- PPE - type, size, maintenance, repair, age, storage, assignment of responsibility, purchasing methods, standards observed, training in care and use, rules of use, method of assignment.
- Transportation - motor vehicle safety, seat belts, vehicle maintenance, safe driver programs.
- First Aid Program/Supplies - medical care facilities locations, posted emergency phone numbers, accessible first aid kits.
- Evacuation Plan - establish and practice procedures for an emergency evacuation, e.g., fire, chemical/biological incidents, bomb threat; include escape procedures and routes, critical plant operations, employee accounting following an evacuation, rescue and medical duties and ways to report emergencies.

SAFETY RULES

These safety rules are designed to provide employees with knowledge of the recognized and established safe practices and procedures that apply to many of the work situations encountered while employed at this organization. It would be impossible to cover every work situation. If any employee is in doubt about the safety of any condition, practice or procedure, they will consult their immediate supervisor for guidance. Any employee that willingly disregards a safety rule may be terminated.

Accident Reporting

All accidents or near misses be reported to a manager or the Safety Coordinator immediately. Falsification of company records, including employment applications, time records or safety documentation will not be tolerated.

Hazard reporting

Employees will notify a unit manager or the Safety Coordinator immediately of any unsafe condition and/or practice.

Alcohol or Illegal drugs
No illegal drugs or alcohol will be allowed on the worksite. Employees will notify their unit manager if they are taking any prescription drugs that might affect their work performance. The use of prescribed medication will be accommodated by the company to every extent possible.

Driving
While driving a company vehicle or driving a personal vehicle for company business, employees will obey traffic laws and signs at all times. Seat belt use is required and employees will obey posted speed limits.

Lifting
When employees are required to lift an item, they should always seek mechanical means (fork lift, lift table, pallet jack, etc.) first. If an item will be lifted manually, employees will refer to the detailed lifting safety rules before performing the task.

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

Personal Protective Equipment
Appropriate Personal Protective Equipment ("PPE") will be worn at all times during hazardous operations. If an employee has any questions or needs PPE, they will notify their unit manager and reference the PPE job hazard analysis. Employees are required to wear approved eye and face protection when sawing, grinding, drilling, using air tools or performing any other task that could generate flying debris. When working with chemicals, employees will wear the required protective eyewear. Gloves will be worn when handling metal, rough wood, fiberglass and other sharp objects. Hard hats will be provided when there are overhead hazards. Appropriate footwear, long sleeved shirts, long pants, high-visibility vest, etc. should also be worn as required.

EMPLOYEE RESPONSIBILITIES
Each employee is responsible to perform tasks safely and read all safety documentation related to their assigned tasks. If an employee is not properly trained in a function, they will notify their immediate supervisor. Not all work procedures can be addressed. The following items are examples of work conditions some operating units, but are not all-inclusive.

- Do not stand on furniture to reach high places; always use a ladder or step stool.
- Use handrails when ascending or descending stairs or ramps.
- Close all drawers to cabinets after use to prevent tripping or bumping hazards.
- Keep cords neatly banded to prevent tripping hazards.
- Use extra caution when transporting glass to avoid breakage and cuts.
- Keep floors clear of water by mopping during and after watering to avoid slips and falls.
- Wear respirators when mixing and spraying chemicals.
- Wear PPE when performing hazardous operations.
- Ensure all exhaust equipment and emergency shut offs are operational prior to beginning work.

ENFORCEMENT OF SAFETY PLAN

Objective

Safety rules are provided as guidelines for safe operations. All employees will follow these rules as a condition of employment.

Scope

The Safety Plan applies to all employees and contractors.

Procedures

All employees will be given a copy of the safety rules upon initial employment. All employees will sign and return the acknowledgment form after they have been given a chance to review the safety rules and ask any questions. The Safety Coordinator will periodically review the safety rules to ensure they are applicable and current.

Enforcement

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

- Management reserves the right to impose any of the following disciplinary actions it deems appropriate:
    1. Verbal warning with documentation in personnel file.
    2. Written warning outlining nature of offense and necessary corrective action with documentation in personnel file.
    3. Termination.
- Management, including unit managers, shall be subject to the above disciplinary action for the following reasons:
    1. Repeated safety rule violations by employees under their supervision.
    2. Failure to provide adequate training prior to job assignment.
    3. Failure to report accidents and provide medical attention to employees injured at work.
    4. Failure to control unsafe conditions or work practices.
    5. Failure to maintain good housekeeping standards and cleanliness in their departments.

INJURY CLAIMS PROCEDURES

All employees will be provided with an explanation of the workers' compensation system and the benefits it will provide by their unit manager.

- In the event of a work-related injury or illness, the injured employee will report it to his/her unit manager or the Safety Coordinator before the end of the work shift.
- If the injured employee needs immediate medical attention, he/she will be driven or sent to the nearest appropriate hospital or clinic.
- If the injury is not an emergency, an appointment will be made with one of the worker's compensation provider's designated medical providers as soon as possible.
- Once a unit manager has been notified of an injury, the manager will provide a list of designated providers and written instructions. The employee will sign and date this written instruction. A copy will be maintained in personnel files and provided to the employee.

- An accident investigation will be conducted by the responsible unit manager following all work-related injuries. The unit manager or Safety Coordinator will be responsible for interviewing the injured employee and all witnesses.
- The Safety Coordinator will report the claim to the worker's compensation provider.
- If the incident involved an employee death or a catastrophe (three or more employees admitted to the hospital) the Chief Executive Officer will be notified immediately and OSHA (1.800.321.6742) will be notified within eight hours.
- The Safety Coordinator will use information from the accident investigation to identify changes that may help prevent future incidents.
- For lost time claims, the unit manager will contact the injured employee at least once a week to answer questions, keep the injured employee informed of organization activities, and discuss return to work options.
- The Safety Coordinator will contact the medical provider after each appointment to keep current on the employees work status, medical progress, and to ensure that appointments are being kept.
- Modified duty procedures will be as follows:
    1. The employee's unit manager who will determine if the employee can return to their regular job duties will evaluate the medical restrictions.
    2. If the employee is unable to return to normal job duties, the unit manager will determine if the employee's position can be temporarily modified to accommodate the restrictions.
    3. If the job cannot be modified, the Safety Coordinator will evaluate other tasks or positions the employee may be able to perform until the medical restrictions are lifted.
    4. If the employee is unable to return safely to a modified position, the medical restrictions will be re-evaluated after each doctor's visit to ensure the employee is returned to work as soon as possible.
- An entry will be made by the Safety Coordinator on an OSHA 300 Log for all cases involving medical treatment. (Employers with more than 10 employees.)
- Accurate records will be kept for all workers' compensation claims. This file will document all communications regarding the claim and all records from the medical providers and worker's compensation provider.

HAZARD COMMUNICATION POLICY

Policy

Chestnut Hill Tree Farm is committed to the prevention of hazardous material and chemical incidents that could result in injury and/or illness to any employee. The company will spare no effort in providing a safe and healthful work environment for employees and all levels of supervision will be accountable for the safety of those employees under their direction.

The Occupational Safety and Health Administration's ("OSHA") Hazard Communication standard (29 CFR 1910.1200) is based on the simple concept that employees have both a need and a "right to know" the identities and hazards of any chemicals they work with during the course of their employment. Employees also need to know what protective measures are available to prevent chemical exposures and how to avoid adverse health effects.

The following constitutes the company's written Hazard Communication program. The company will meet the requirements of OSHA's Hazard Communication standard as follows:

Container Labeling

It is the policy of the company that no container will be released for use unless it has a complete label. Unit managers will ensure that secondary containers, such as spray bottles, have complete labels. Either (1) a copy of the original manufacturer's label will be made and placed on the secondary container, or (2) the minimal information bulleted

above will be placed on the container in permanent ink. The Safety Coordinator will verify that all product containers kept onsite will clearly list contents on the label:

- Product Name;
- Hazard warnings (corrosive, flammable, skin irritant, etc.); and
- Manufacturer's name and address.

Material Safety Data Sheets

Copies of Material Safety Data Sheets ("MSDSs") for all hazardous chemicals to which employees of this company may be exposed will be available on the intranet and by hard copy in each chemical area of the department in a binder designated "MSDS Sheets." Employees are required to read MSDSs for the chemicals they use. MSDSs will be available to all employees during all shifts. If an MSDS is missing, or if a new product arrives without an MSDS, employees will immediately inform the unit manager so they can call the supplier or manufacturer.

Employee Information and Training

Unit managers are responsible for conducting job specific hazard training on chemicals used by their employees. After attending training, each employee will sign a form to verify that he or she attended the training, received written materials, and understands the company policies on hazard communication. Prior to starting work, each new employee will attend a health and safety orientation and will receive information and training on the following:

- An overview of the requirements contained in OSHA's HAZCOM standard: 29 CFR 1910.1200.
- Chemicals present at the company.
- Location and availability of the company's written hazard program.
- Physical hazards and health effects of the company's hazardous chemicals.
- Methods and observation techniques used to determine the presence or release of hazardous chemicals in the work area.
- How to reduce or prevent exposure to these hazardous chemicals by using engineering controls, work practices and personal protective equipment.
- Steps the company has taken to reduce or prevent exposure to these chemicals.
- Emergency procedures to follow if an employee is exposed to chemicals.
- How to read labels and review MSDS to obtain appropriate hazard information.

Training Updates

Training shall be provided at the time of initial assignment to tasks where occupational exposure to a hazardous chemical may take place. Training shall be repeated by the Safety Coordinator whenever a new chemical or a new hazard is introduced in the work area.

Hazardous Chemicals List

Unit managers will maintain a list of all the chemicals and products used at the company within their unit. This list is kept in the front of the MSDS book. Each chemical entry on the inventory list has a corresponding MSDS available for providing specific hazard information and personal protective measures. This list will be updated quarterly by the Safety Coordinator to remove chemicals that are no longer in use at the company and to add new products.

Hazardous Non-routine Tasks

Occasionally, an employee may be asked to perform a task that is not part of their normal job. Before taking on a new task, the affected employee will be given information by their unit manager about any hazardous chemicals that might be used during the activity. This information will include:

- Specific chemical hazards;
- Protective measures employees can take; and

- Measures the company has taken to reduce the hazards, which might include ventilation, personal protective equipment, use of the buddy system, and emergency procedures.

Contractors

It is the unit manager's responsibility to identify and obtain MSDSs for chemicals any contractor brings into the company facilities. It is the responsibility of unit managers to provide contractors with the following information:

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

RESPIRATORY PROTECTION PROGRAM

Policy

It is the policy of the company that all employees working in areas or job classifications requiring the use of tight-fitting respirators will undergo medical evaluation and fit testing before assignment. In addition, these employees will receive training on the requirements of this program as well as specific instruction on the proper use, maintenance, and limitations of respirators.

Voluntary respirator use will be limited to the use of filtering face piece type respirators such as dust masks. All employees using filtering face piece type respirators will receive instruction on the proper use and limitations of this type of respirator by the Safety Coordinator.

Under no circumstances will employees use self-contained breathing apparatus type respirators ("SCBAs") or will employees be exposed to chemical concentrations approaching Immediately Dangerous to Life or Health ("IDLH") concentrations. All emergency situations including gas leaks and chemical spill response will be handled by local emergency response agencies in accordance with the company's emergency and incident response plan.

All expenses associated with training, medical evaluations and respiratory protection equipment will be provided and compensated by the company.

Purpose

Engineering controls, such as ventilation and substitution of less toxic materials, are the first line of defense for the company; however, engineering controls have not always been feasible for some of the company's operations, or have not always completely controlled the identified hazards. In these situations, respirators and other protective equipment will be used. When properly used, respirators are effective in protecting employees from exposure to potentially harmful substances.

To provide effective protection, respirators will be properly fitted to the individual employee and properly worn by the employee. In addition, respirators make breathing more difficult which may cause significant health problems for individuals with existing medical conditions. This written respiratory protection program insures that employees are properly trained, fit tested, and medically cleared in order to provide maximum employee protection.

Program Administrator

The designated program administrator is the Safety Coordinator of the company. The program administrator is responsible for administering the respiratory protection program.

- Duties of the program administrator include:
    1. Identifying work areas, processes or tasks that require workers to wear respirators.
    2. Selection of appropriate respirators.
    3. Arranging for or conducting training.
    4. Ensuring proper storage and maintenance of respiratory protection equipment.
    5. Arranging for or conducting fit testing.
    6. Insuring all employees using tight-fitting respirators are medically cleared.
- Providing an approved medical provider with the following for each employee required to wear a respirator:
    1. A copy of this program.
    2. Required type and weight of respirator.
    3. Length of time required to wear respirator.
    4. Expected physical workload (light, moderate, or heavy).
    5. Potential temperature and humidity extremes.
    6. Specifications for any additional protective clothing required.
    7. Annual evaluation and updating of the written program.
    8. Recordkeeping.

Respirator Selection

The Certification of PPE Hazard Assessment outlines the work areas and job classifications where respirators are required along with the types of respirators necessary. Respiratory protection determinations for non-routine tasks and future jobs will be performed by the program administrator using the following procedures:

- Identification of the hazardous substances using material safety data sheets or other appropriate resources.
- Review of work processes to determine where potential exposures to these hazardous substances may occur.
- Employee exposure assessments utilizing air monitoring, published exposure data, or information provided by manufacturers or trade associations.
- Appropriate respirators will be selected using information from respirator vendors along with information contained in the OSHA Small Entity Compliance Guide for the Revised Respiratory Protection Standard available at www.osha.gov.
- All respirators will be certified by the National Institute for Occupational Safety and Health ("NIOSH") and shall be used in accordance with the terms of that certification. Also, all filters, cartridges, and canisters will be labeled with the appropriate NIOSH approval label. The label will not be removed or defaced while it is in use.

Medical Evaluation

Employees who are either required to wear respirators (other than dust masks) will pass a medical evaluation before being permitted to wear a respirator on the job. Any employee refusing the medical evaluation will not be allowed to work in an area requiring respirator use.

- A licensed physician or licensed health care practitioner will provide the medical evaluations. Medical evaluation procedures are as follows:
    1. The medical evaluation will be conducted using the appropriate worker compensation provider forms.
    2. All affected employees will be given a copy of the medical questionnaire to fill out during the workday, along with a stamped and addressed envelope for mailing the questionnaire to the company physician.
    3. Follow-up medical exams will be granted to employees as deemed necessary by the medical clinic physician.
    4. All employees will be granted the opportunity to speak with the physician about their medical evaluation, if they so request.

5. Any employee required for medical reasons to wear a positive pressure air-purifying respirator will be provided with a powered air-purifying respirator.

- After an employee has received clearance and begun to wear his or her respirator, additional medical evaluations will be provided if an employee reports symptoms such as “shortness of breath”, “dizziness”, or “wheezing”. In addition, additional medical evaluations will be performed if a change in the workplace results in an increased physiological burden on the employee.

Fit Testing

Initial fit testing is required for all employees required to wear respiratory protection. The company currently offers respirators for voluntary use; therefore fit testing is not required at this time. In the event that the company needs to change its policy, fit testing will be performed by an approved medical provider using the OSHA Qualitative Fit Test Protocol outlined in Appendix A of 29 CFR 1910.134. Employees will be fit tested with the make, model, and size of respirator that they will actually wear. Employees will be provided with several models and sizes of respirators so that they may find an optimal fit. Fit testing will be repeated annually and whenever there are changes in the employee's physical condition that could affect respiratory fit (e.g., obvious change in body weight, facial scarring, etc.).

Respirator Use Procedures

Respirators shall not be used in a manner inconsistent with their NIOSH certification or manufacturer’s instructions.

- All employees shall conduct user seal checks each time that they wear their respirator. Employees shall use either the positive or negative pressure check.
- Employees are not permitted to wear tight-fitting respirators if they have any condition, such as facial scars, facial hair, or missing dentures, that prevents them from achieving a good seal.
- Respirators shall be cleaned as often as necessary using the cleaning supplies located in the locker room.
- Employees will perform thorough visual inspections of their respirators at the beginning of each work shift.
- Worn or defective respirators will be taken out of service immediately.
- Respirators will be stored in a clean plastic bag in an uncontaminated area.
- Respirator cartridges will be dated with a permanent marker at the time they are installed on the respirator.
- Respirator cartridges will be replaced by the Safety Coordinator according to the manufacturer’s schedule.

Training Required

All respirator users and their unit managers will be trained annually by the Safety Coordinator on the contents of this respiratory protection program and their responsibilities under it, and on the OSHA Respiratory Protection standard. Employees will be trained prior to using a respirator in the workplace. Unit managers will also be trained prior to using a respirator in the workplace or prior to supervising employees that will wear respirators. Employees will demonstrate their understanding of the topics covered in the training. Training will be documented in the employee’s personnel file. The training course will cover the following topics:

- Respiratory hazards encountered at the company and their health effects.
- Proper selection and use of respirators.
- Limitations of respirators.
- Respirator donning and user seal (fit) checks.
- Fit testing.
- Maintenance and storage.
- Medical signs and symptoms limiting the effective use of respirators.

Program Evaluation

The program administrator will conduct annual evaluations of the workplace to ensure that the provisions of this program are being implemented. The evaluations will include regular consultations with employees who use

respirators and their unit managers, site inspections, air monitoring and a review of records. The written program will be updated to correct any deficiencies found.

Recordkeeping

The program administrator will maintain the following records:

- A written copy of this program and the OSHA standard.
- Copies of initial and refresher training content and documentation of attendance.
- Fit test records including the make, model, and size of respirator if required.
- Copies of the physician's written recommendation regarding each employee's ability to wear a respirator.
- Copies of the results of any hazard assessments including air monitoring.

Part 3.B.3.k. Relationship(s) with an independent laboratory(ies) with cannabis testing protocols and methods

Quality assurance is the most important function for the company. Although some labs have expressed an interest in servicing the low-THC cannabis licensees, the company prefers to utilize the services of a laboratory that has a history of experience in analyzing medical cannabis. The company will implement a testing model that utilizes expertise from around the country to ensure the safety and purity of all medical cannabis products.

The company will engage Green Standard Diagnostics to implement the company's laboratory functions. The company will provide independent contractors to perform laboratory analysis and quality assurance services. These employees will be independent from Chestnut Hill Tree Farm's employees. Green Standard Diagnostics is an advisory firm led by Dr. Jahan Marcu which provides quality assurance and product formulations to the cannabis industry. Dr. Marcu is a leading cannabinoid researcher and known worldwide for his work. Dr. Marcu's staff of independent contractors consists of some of the best scientists in the country working on medical cannabis.

In order to validate the testing results provided by Green Standard Diagnostics, the company will also engage the services of CannLabs, Inc. The laboratory was founded in 2010 and is headquartered in Denver, Colorado. CannLabs is a national leader for cannabis testing. The lab regularly tests products for the Realm of Caring in Colorado and has extensive experience with CBD rich product testing. The lab's president also serves on the Flowering Hope Foundation's board. CannLabs has assisted these groups and countless patients in analyzing their formulations to achieve the desired cannabinoid profile. The lab also provides input to legislators and regulators across the country on testing regulations.

CannLabs is certified by the Colorado Department of Health and Environment and has also earned the American's for Safe Access Patient's First laboratory certification for operations and methods exceeding the requirements published by the American Herbal Products Association and American Herbal Pharmacopeia. CannLabs is dedicated to the health, safety, and education of patients. The lab allow clients to publish their test results adding to the limited knowledge base on the profile of cannabis products. The lab also has the technical capability to integrate test results with the BioTrackTHC system allowing the company to add validated test results directly to product labels.

Green Standard Diagnostic employees will perform testing in the processing facility's laboratory. All products will be analyzed for potency/profile, terpenes, heavy metal, pesticide, and microbial contamination. CannLabs will utilize a secure VPN system called Team Viewer to link directly to the operating system of each instrument. The CannLabs team will review and validate all test data. The laboratory staff onsite at the processing facility will scan a batch prep sheet to CannLabs prior to review to confirm all batch numbers in the instrument for accuracy. The instrument data will be exported into the CannLab proprietary Workflow laboratory management system. The CannLabs system will generate an independent Report of Analysis for Chestnut Hill Tree Farms to provide to patients for review.

Microbiology tests will require the onsite laboratory to additionally send a photograph of any plates that result in positive hits. CannLabs will then perform a visual inspection of the plate for confirmation of positive results. For samples that have a visual confirmation of a contaminant, the on-site laboratory staff will swab and sample of the colony and send it to CannLabs confirmation via qPCR. The laboratory onsite will also run the secondary test on the laboratory's qPCR. CannLabs will record the results of the tests in the Workflow and Chestnut Hill Tree Farm will download results.

MEMORANDUM OF UNDERSTANDING
BETWEEN
CANNLABS, INC. AND CHESTNUT HILL TREE FARM, LLC.

This Memorandum of Understanding (hereinafter "MOU"), dated as of July 3, 2015 (hereinafter "Effective Date") is by and between Chestnut Hill Tree Farm, LLC (hereinafter "CHTF"), and CannLabs, Inc. (hereinafter "CannLabs").

RECITALS

WHEREAS, CHTF has applied for a license to operate a dispensing organization in the State of Florida and will require a relationship with an independent laboratory if approved, and

WHEREAS, CannLabs is a nationally recognized leader in cannabis analytics, and

WHEREAS, in the judgment of the parties, it is necessary and desirable for CannLabs to provide, and CHTF to use, the services of CannLabs for independent review of CHTF laboratory analyses and results, and

WHEREAS, each party affirms its intent to comply with all applicable laws and best practice.

NOW, THEREFORE, in consideration of the foregoing recitals and the mutual covenants contained herein, the parties hereto agree as follows:

AGREEMENT

I. CannLabs Roles and Responsibilities

CannLabs agrees to provide independent laboratory data review services for CHTF. The laboratory services are presented in the attached Exhibit A, Scope of Work, made a part of this MOU by reference.

CannLabs will also provide proficiency testing and onsite auditing of CHTF's independent laboratory operator, Green Standard Diagnostics, Inc.

With respect to any identifiable information concerning any confidential information or trade secrets under this contract that is obtained by CannLabs, CannLabs agrees to maintain confidentiality and shall hold CHTF harmless from any sanctions imposed on CannLabs, to the extent permitted by law, for breach of these regulations. CannLabs (1) will not use any such information for any purpose other than carrying out the express terms of this contract, (2) will promptly transmit to CHTF all requests for disclosure of such information not emanating from the client, and (3) will not disclose, except as otherwise specifically permitted by this contract or authorized by the client any such information to any party other than CHTF without prior written authorization specifying that the information is releasable.

CannLabs shall provide results to the Office of Compassionate Use upon request.

II. CHTF Roles and Responsibilities

CHTF will determine whether data review should be performed by CannLabs. CHTF is

responsible for complying will all laws. CHTF is responsible for transmitting all batch data to CannLabs and for providing VPN access to instrumentation. CHTF will assume responsibility for handling specimens within approved guidelines for time, temperature and other critical factors prior to analysis. CHTF will provide the names and contact information necessary to receive web-based reporting of test results.

CHTF will establish acceptable limits to determine if a batch is authorized for sale. Upon receipt of a failed results, CHTF shall rework the batch for retesting or destroy it. Should CannLabs suspect for any reason that CHTF is distributing a batch that did not meet acceptable limits, they shall report this concern to the Office of Compassionate Use.

III. Payment

In full consideration of satisfactory performance by CannLabs in providing services required under this MOU, CHTF shall be billed for services in accordance with Exhibit B.

IV. Performance Standards

CannLabs shall follow procedures and methods approved by the Colorado Department of Health and Environment for their cannabis laboratory certifications in Colorado. In the event that the State of Florida issues guidance or rule regarding cannabis laboratories, the services agreement will be revised accordingly.

V. Term of MOU

The term of this MOU shall be effective upon award of a license to operate a dispensing organization by the State of Florida to CHTF and continue until June 30, 2017 unless terminated earlier in accordance with the provisions of Section VI below and has no force or effect until fully executed by CHTF and CannLabs.

VI. Termination

1. Termination. This MOU may be terminated by either party by delivery of a written notice thirty (30) days prior to the date of termination.

2. Payment Upon Termination. Upon termination of this MOU, CannLabs shall be entitled to receive full payment prorated annually for all services satisfactorily rendered and expenses incurred within the term of the agreement.

3. Authority to Terminate. The Chief Executive Officer has the authority to terminate this MOU on behalf of CannLabs. The Chief Executive Officer has the authority to terminate this MOU on behalf of CHTF.

VII. Indemnification

Except as provided below, each party shall indemnify, defend, protect, hold harmless, and release the other, its officers, agents, and employees, from and against any and all claims, loss, proceedings, damages, causes of action, liability, costs, or expense (including attorneys' fees and witness costs) arising from or in connection with, or caused by any act, omission, or negligence of such indemnifying party. This indemnification obligation shall not be limited in any way by any limitation on the amount or type of damages or compensation payable to or for the indemnifying party under worker's compensation acts, disability benefit acts, or other employee benefit acts.

VIII. Method and Place of Giving Notice, Submitting Bills and Making Payments

All notices, bills, and payments shall be made in writing and shall be given by personal delivery, electronic mail, or by U.S. Mail or courier service. Notices, bills, and payments shall be addressed as follows:

TO CANNLABS:

Attn: Accounts Receivable
CannLabs, Inc.
3888 E. Mexico Ave. #205
Denver, CO 80210

TO KNOX:

Attn: Accounts Payable
Chestnut Hill Tree Farm, LLC
15105 NW 94th Ave.
Alachua, FL 32615

When a notice, bill or payment is given by a generally recognized overnight courier service, the notice, bill or payment shall be deemed received on the next business day. When a copy of a notice, bill or payment is sent by electronic email or facsimile, the notice bill or payment shall be deemed received upon transmission as long as (1) the original copy of the notice, bill or payment is promptly deposited in the U.S. mail, (2) the sender has a written confirmation of the facsimile transmission, and (3) the facsimile is transmitted before 5 p.m. (recipient's time). In all other instances, notices, bills and payments shall be effective upon receipt by the recipient. Changes may be made in the names and addresses of the person to who notices are to be given by giving notice pursuant to this paragraph.

IX. Merger

This writing is intended both as the final expression of the MOU between the parties hereto with respect to the included terms and as a complete and exclusive statement of the terms of the MOU. No modification of this MOU shall be effective unless and until such modification is evidenced by a writing signed by both parties.

The remainder of this page left blank intentionally.

IN WITNESS WHEREOF, the parties hereto have executed this MOU as of the Effective Date.

CannLabs, Inc.:

_____ Date _____
Name, Title

Chestnut Hill Tree Farm, LLC.:

Richard [illegible] President Date 7-1-15
Name, Title

IN WITNESS WHEREOF, the parties hereto have executed this MOU as of the Effective Date.

CannLabs, Inc.:

CEO _____ Date 7/3/15
Name, Title

Chestnut Hill Tree Farm, LLC.:

_____ Date _____
Name, Title

Exhibit A

Scope of Work

CannLabs will:

- Maintain adequate equipment and facilities and sufficient personnel to carry on dependable data review.
- Employ procedures, methods, and reporting practices consistent with all applicable laws and good laboratory practice.
- Establish and maintain for a minimum of two years adequate record systems and files of laboratory work done.
- Conduct, maintain, and operate programs for controlling the quality of test performance.
- Demonstrate satisfactory performance in a proficiency testing program.

CannLabs will provide the following data review services to CHTF:

Data Review Services

- Potency
- Terpene
- Residual solvents
- Pesticide residuals
- Microbiologicals
- Alfatoxin and ochratoxin
- Heavy metals

Acceptable Limits

CHTF shall provide CannLabs with its permissible levels standards prior to sending any batches for analysis. CHTF shall provide CannLabs with a minimum of fourteen (14) days' notice prior to any revision of the acceptable test limits.

Processing Time and Testing Results

CannLabs will complete requested reviews within three (3) business days of the batch request. CannLabs will provide web based reporting, and supply a valid user ID and password to access test results online.

Exhibit B

Service Fees

CannLabs will provide CHTF an itemized bill monthly for services at a rate of $150 per hour plus any consumables or travel expenses. All bills will be payable on a Net 30 basis.

The remainder of this page left blank intentionally

4. ACCOUNTIBILITY

Part 3.B.4.a. Floor plan of each cultivation facility or proposed floor plans for proposed processing facilities

Including the following: i. Locking options for each means of ingress and egress; ii. Alarm systems; iii. Video surveillance; iv. Name and function of each room v. Layout and dimensions of each room

The company's security plans are attached for review. Chestnut Hill Tree Farm will engage the services of Crime Prevention Security Services to provide security infrastructure for the process facility. The following proposal provides an initial description of the planned system.

CONSULTANT:

CHESTNUT HILL TREE FARM

15105 NW 94TH AVENUE ALACHUA, FL 32615

CONCEPT

PROJECT NO.:
XXXXXX

DRAWN BY:
XXX

ISSUE DATE:
XX/XX/XXXX

REVISION SCHEDULE	
REVISION NO.	REVISION DATE

SHEET TITLE:
SITE PLAN

SHEET NO.:
A100

[redacted]

CONSULTANT:

CHESTNUT HILL TREE FARM

15105 NW 94TH AVENUE ALACHUA, FL 32615

CONCEPT

PROJECT NO.:
XXXXXX

DRAWN BY:
XXX

ISSUE DATE:
XX/XX/XXXX

REVISION SCHEDULE	
REVISION NO.	REVISION DATE

SHEET TITLE:
GROUND FLOOR SECURITY PLAN

SHEET NO.:
A102

Part 3.B.4.b. Storage

Including the following: i. Safes; ii. Vaults; and iii. Climate control

[redacted]

[redacted]

OVERVIEW

Chestnut Hill Tree Farm intends to grow cannabis, and manufacture and distributes medical Derivative Products, which is a controlled substance with many incentives for diversion. Supply chain security is a top priority of the company and a primary job duty of all employees, reinforcing a company-wide culture of responsibility. The Security Officer will be responsible for the development and implementation of the anti-diversion policies and procedures, with managers responsible for oversight at each facility.

Diversion includes, but is not limited to employee or third-party theft or transfer of medical Derivative Products by an employee, patient, or caregiver to an unqualified individual. Best practice dictates that the company demonstrates control and security over its controlled substances inventory. The company has adopted multiple policies and procedures to prevent diversion and trafficking of the controlled substances they produce. Anti-diversion protocols paired with strict security and recordkeeping protocols will ensure that all medical cannabis materials are controlled throughout their life cycle.

Chestnut Hill Tree Farm will implement comprehensive policies and procedures to be implemented by the organization in order to ensure the prevention of diversion, abuse, and other illegal or unauthorized conduct relating to medical Derivative Products. Specifically all cannabis materials and medical Derivative Products will be stored in such a manner as to prevent diversion. The company will have a robust security system that prevents and detects diversion, theft, or loss of cannabis and medical Derivative Products.

Specific considerations regarding anti-diversion measures include methods for increased patient accountability along with methods for identifying, recording, and reporting diversion, theft, or loss, and for correcting all errors and inaccuracies in inventories.

BIOTRACKTHC

Upon propagation, BioTrackTHC automatically assigns a globally unique non-repeatable 16-digit barcode number to every plant. This barcode follows the plant through its entire product life cycle. The system will also track the precise location of every given plant within a designated room, bed or plant table using an ‘abc, 123’ grid base. Throughout the production process, the licensed producer may enter production notes into the plant-specific inventory record (i.e. events or any required notations that do not currently have pre-defined fields within the system). Upon harvest the system will batch designated plants together and assign a unique barcode to the collection, although the plants are grouped together during the harvest the individual plant barcodes are associated and cataloged within the batch inventory details. All flower, waste, sugar leaf, and other material will be collected, measured and associated appropriately to the original plant barcodes. These weights are also entered using vertically integrated scales to diminish the possibility of human error or manual manipulation. The system can also record both the wet and dry weights of flower material to track moisture loss percentages. The product can be notated and sampled at this juncture for testing purposes. Once testing results are retrieved, they can be directly associated with the product batches.

SPECIFIC DIVERSION PREVENTION PROCEDURES

EMPLOYEE BACKGROUND CHECKS

The company will not employ anyone with a history of theft or diversion based on a background check report. All employees will receive a Level 2 background check prior to employment. If an employee is identified who post-employment has been convicted of a felony involving theft or diversion or any felony of sale or possession of drugs, narcotics, or controlled substances, he or she will be terminated.

EMPLOYEE TRAINING

Extensive training of all employees will ensure that all staff is both knowledgeable of security and diversion issues and properly trained to comply with all required security measures.

ACCESS TO FACILITIES

No person, except a company employee, shall be allowed on the premises of any company facility unless they are an authorized visitor and escorted by an employee at all times.

EMPLOYEE ACCESS TO MEDICAL CANNABIS PRODUCTS

Access to cultivation areas is restricted to employees and regulators and based on their granted level of security access. Access to each separate functional area is granted to an employee based on his or her experience, tenure, and level of responsibility. Only manager level employees have access to cure and storage areas. All plant material from propagation to the transfer to manufacturing is tracked throughout the cultivation process. Transfers of cannabis will be:

- Approved by a director level employee,
- Fully documented in the inventory control system and by camera surveillance, and
- Limited to the internal manufacturing unit. No usable plant material may ever leave the production facility.

VISITORS ACCESS TO MEDICAL CANNABIS

Visitors will be handled in accordance with the company's visitor policies and procedures. Visitors will always be accompanied by authorized personnel and will never be granted access to cannabis materials or medical cannabis product storage areas unless required for provision of services.

All persons who are not employees, certified patients, or designated caregivers, but who have been authorized by management to enter the facility shall obtain a visitor identification badge from a facility employee prior to entering the facility. An employee will escort and monitor the visitor at all times while the visitor is in the facility. The visitor identification badge shall be visible at all times. The facility will require the visitor to return the identification badge upon exiting the facility.

Each facility will maintain a visitor log, which shall include the name of the visitor, date, time and purpose of the visit. The visitor log shall be available to the OCU and law enforcement at all times during operating hours and upon request.

If an unforeseen circumstance requires the presence of a visitor and makes it impractical for a facility to obtain prior authorization from the OCU, the facility shall record in the visitor log, the name of the visitor, date, time, purpose of the visit and the facts upon which the access was granted.

INVENTORY MANAGEMENT AND POINT OF SALE SYSTEM

The inventory management and point of sale system provides additional opportunities to increase control over cannabis and medical Derivative Products. Managers will review entries and transactions in accordance with the specific schedule set in their department.

ENVIRONMENTAL SCANNING

The Security Officer will regularly review information from external sources including law enforcement, trade and patient associations, advocacy groups, list serves, and patients and caregivers related to factors that may impact the incentive for diversion (i.e. system-wide shortages, changes in law, rapidly increasing patient registrations, etc.). If the Security Officer concludes that a change in diversion risk based on environmental factors exists, a risk mitigation plan will be developed and implemented.

PACKAGING AND LABELING

Medical Derivative Products will be packaged in child-resistant and tamper-proof or tamper-evident, light-resistant unit-dose (i.e. 1g concentrate or 50g CBD vape pen) packaging. For deliveries from the manufacturing facility to the dispensing facility, tamper-proof tape and single-use identification coding will be used to secure containers. All packaging and labeling will be in accordance with company policies and procedures for packaging, labeling, product storage, and delivery.

RECEIVING MEDICAL CANNABIS PRODUCTS

Two employees, one being a Security Officer, are required to receive any medical Derivative Products into inventory at any location. The entire transaction will be monitored by the Security Officer. Each employee will confirm by signature the accuracy of the delivery invoice, identification numbers, number of containers, the total inventory count received, and the accuracy of the entry of the inventory into the inventory management system in accordance with the inventory management policies and procedures.

STORAGE OF EXPIRED AND DISPOSED MEDICAL CANNABIS PRODUCTS

All medical Derivative Products awaiting disposal will be stored in a locked container, in a secure area, recorded, and disposed of in accordance with the company's waste disposal policies and procedures.

[redacted]

[redacted]

[redacted]

[redacted]

Emergency Contacts

Emergency contacts will be posted at every facility. Phone numbers for the alarm company, surveillance company, fire department, police department, spill response team, poison control center, OCU contact, and 911 will be posted and updated as needed.

Changes to Security Plan

Any local law enforcement or OCU security directives will be incorporated into the security plan. Any changes to security protocols will be reviewed, approved by the Chief Operating Officer, and documented. Any changes will also be distributed to employees and re-training will be scheduled as soon as possible if required.

Communication with Law Enforcement

The Security Officer will maintain a list of non-emergency police department contacts for each facility. The Director will maintain regular communication with each contact advising of any changes in security procedures. The company intends to develop strong partnerships with local law enforcement agencies. The Security Officer will engage these agencies to support the company's security plans through collaborative training, observation patrols, rapid response to incidents, and proactive meetings.

Reporting Required

All employees are required to report any of the following incidents to their supervisor or the Security Officer. The Director will report such incidents to law enforcement and the OCU as necessary:

- An alarm activation or other event that requires a response by public safety personnel;
- The failure of any security alarm system due to a loss of electrical power or mechanical malfunction;
- Discrepancies identified during inventory, diversion, theft, loss, and any criminal action involving owners, managers, or employees;
- Unauthorized destruction of cannabis;
- Any loss or unauthorized alteration of records relating to cannabis inventory, patients, caregivers, or employees; and
- Any other breach of security that may present a continued threat.

Equipment Maintenance

The Security Officer will schedule and oversee all maintenance of security equipment in accordance with manufacturer recommendations. Any equipment failure identified will be corrected as soon as possible. All security equipment will be in good working order and will be inspected and tested at regular intervals.

ROBBERY PREVENTION MEASURES

Each facility and transportation vehicle is a high value target for burglars and robbers. A robbery in progress is an Incident and will be handled in accordance with this plan. The most effective way to ensure the safety and security of employees and patients is utilizing prevention strategies. All employees are required to have a good working knowledge of this Security Plan and to implement prevention measures into daily activities. Transportation of cannabis will be performed in accordance with transportation procedures.

[redacted]

[redacted]

Cash Management

- Each employee handling cash will be trained in the types of related incidents related to cash and is required to handle cash in accordance with the company's cash management and accounting procedures.
- The Chief Operating Officer is responsible for the development and implementation of cash management procedures.

[redacted]

INFORMATION TECHNOLOGY SECURITY

The IT Director is responsible for ensuring the security of the company's hardware, software, data, and communications networks. The Director is responsible for all IT maintenance including software registration, security patches, malicious software prevention, account management, security status, and network access monitoring, disposal and redeployment, employee IT security training and vulnerability assessments. All employee passwords for software and network access will be changed every six months. The IT Director will ensure system required password changes. Access to protected information will be restricted to essential personnel only. Examples of protected information include:

- Security and cash management procedures,
- Asset and inventory lists,
- Network data,
- Floor plans of critical areas,
- Password and code records,
- Patient and caregiver records, and
- Employee records.

The IT Director is required to identify and respond to all cyber security incidents. Incidents include natural disasters impacting technology infrastructure and unauthorized network access exposing protected information.

Part 3.B.4.d. A facility emergency management plan for the processing facilities

EMERGENCY & INCIDENT RESPONSE PROTOCOLS

Chestnut Hill Tree Farm has established procedures for addressing emergencies and incidents including natural disasters, fire, unauthorized facility access, theft, of Derivative Products or release of confidential information. Provisions for emergency and incident management, containment, and corrective measures are thoroughly detailed. The Chief Operating Officer is assigned responsibility for confirming the occurrence of an incident requiring the execution of this protocol and for ensuring the response protocol is followed.

The Security Officer will immediately notify appropriate law enforcement authorities within twenty-four hours after the discovery of a reportable incident. All incident response and emergency activities will be documented. All documentation related to a reportable incident will be maintained for no less than five years and made available, upon request, to OCU and to law enforcement authorities acting within their lawful jurisdiction.

The primary emphasis of activities described within this protocol is the return to a normalized (secure) state as quickly as possible, while minimizing adverse impacts to the company. The company's plan addresses incident identification, response protocols, containment activities, and corrective measures.

RESOURCES

Ready.gov
National Fire Protection Association

INCIDENT IDENTIFICATION & TRAINING

Types of Emergencies and Incidents

Types of incidents include, but are not limited to:

- Theft or physical loss of Derivative Products or confidential records;
- Robbery or unauthorized entry to the facility;
- Threats of violence to the facility, personnel or visitors; or
- Other incidents including:
    1. Bomb threats
    2. Fires
    3. Earthquakes
    4. Hazardous Materials Release
    5. Floods
    6. Windstorms
    7. Civil Disturbances
    8. Pandemic Flu
    9. Serious Accidents or Health Emergencies
    10. Criminal Activity

Incident Training Required

All employees will be required to receive incident management training upon hiring and annually in accordance with the staffing and training policies of the company. The Chief Operating Officer will ensure the adequate training of employees. Third-party trainers may be utilized as necessary.

ROLES & RESPONSIBILITIES

Employee Responsibilities

- Each employee will be familiar with the contents of this plan and will know the location of alarms, utility cabinets, fire extinguishers, emergency exits and first aid supplies.
- In the case of fire, if trained and safe to do so, extinguish the fire using a portable fire extinguisher.
- If a manager is not available to make an evacuation decision, all employees will make a determination with the health and safety of employees and visitors as the primary consideration.
- A gas leak in the production facility requires an evacuation until the fire department clears the facility.
- Do not re-enter the building or allow others to re-enter during an emergency. Stay with customers and other evacuated employees until interviewed by the unit manager or Chief Operating Officer.
- Each unit manager will maintain and visibly post a current emergency contact list and evacuation plan. All employees should save emergency contact numbers in their company or personal cell phones.
- Each unit manager will pre-plan an evacuation route, maintain and post the evacuation route map based on familiarity with the building and customer safety. Every employee will know the evacuation route and the location of the map. Always take the nearest stairwell.
- Regular review of facility floor plans and evacuation plan maps will be completed by the unit manager and updated as necessary.

Chief Operating Officer Responsibilities

To ensure an appropriate and timely execution of appropriate incident response, the Chief Operating Officer will:

- Develop and maintain this plan continuously. Identify potential hazards, develop mitigation strategies and improve the response protocols accordingly. Update unit managers and training programs as needed. Each facility will be stocked with an emergency preparation kit including provisions for sequestration in the facility if required.
- Maintain an updated emergency notification contact list. Maintain an internal contact list and employee notification system via email and text messaging.
- Visibly post all evacuation routes. Ensure all environmental detectors and alarms, emergency lighting and exit signs are operational.
- Confirm the occurrence of an incident requiring the execution of this protocol.
- Secure all products following any instance of diversion, theft or loss of cannabis and conduct an assessment to determine whether additional safeguards are necessary.
- Collect any evidence supportive of the event (unless law enforcement is required and collects evidence).
- Supervise and direct the consistent, timely and appropriate response to an incident.
- Provide appropriate communication to parties having a vested interest in the incident.
- Offer support to employees, customers or other interested parties as appropriate until the incident is resolved.
- Conduct a post-incident review and report making any necessary adjustments to security measures and procedures.

PROTOCOLS

Guidelines for All Employees

Reports of emergencies and incidents may come from outside parties, customers, other employees, news sources, direct observation or other sources. The primary objective for all employees is to determine if the problem being reported is an incident. In most instances, the problem being reported will not constitute an incident as defined within the protocol. However, the protocol can be a good guideline for dealing with other minor issues. No set of protocols will address every circumstance; all employees will in good faith take all necessary and responsible actions.

Receiving External Reports

All employees are accountable for asking necessary questions about an incident, making a reasonable attempt at determining if an incident has occurred, recording facts and responses to questions and forwarding pertinent information to the unit manager or Chief Operating Officer immediately. If the employee cannot reach the managers, the Chief Executive Officer will be contacted. Duties include, but are not limited to:

- Familiarity with this protocol and the appropriate procedures.
- Individuals reporting problems and/or incidents to an employee should be informed as to the reason for the questions and all individuals should be encouraged to openly discuss the problem being reported.
- Any information provided by an individual that helps in the determination is of considerable value; the individual's cooperation is critical, greatly appreciated and should be recognized by the employee receiving the report.

Discovery and Internal Reporting

If the situation indicates that an incident may have occurred, employees should assume that an incident has actually occurred and perform the following activities:

- Obtain and record the contact information for the individual reporting the problem (name, telephone numbers and email address).
- Record relevant information about the incident (e.g., time/date of suspected occurrence, type of information compromised, location of the compromise) in the Incident Report Log.
- Inform the individual to expect contact from a member of management.
- Request the individual to treat the incident as a confidential matter.
- Notify the unit manager or Chief Operating Officer immediately of the incident.

Assessment and Escalation

Except in the case of an emergency needing immediate attention, the Chief Operating Officer will determine the category and severity of the incident and undertake discussions and activities to best determine the best course of action. All discussions, decisions and activities are to be documented as described herein. The Chief Operating Officer is responsible for making an early determination if an incident has occurred or might be indicated. If the employee cannot reach the unit manager or Chief Operating Officer, the Chief Executive Officer will be contacted as soon as possible.

Notification and Communication

The Chief Operating Officer will take action to notify the appropriate internal and external parties as necessary.

- Internal notification – the Chief Operating Officer will notify the Chief Executive Officer of an incident as soon as possible and then will notify other employees as necessary.
- External notification – unless responders will be notified in an emergency, all external notifications and communications will be approved by the Chief Executive Officer. External parties may include regulators, suppliers, customers, media or other affected parties.

Containment

The Chief Operating Officer, with the Chief Executive Officer if available, will determine and cause to be executed and the appropriate activities and processes required to quickly contain and minimize the immediate impact to personal safety, the company, customers and other affected parties. Containment activities are designed to:

- Minimize harm to individuals.
- Counteract the immediate threat.
- Prevent propagation or expansion of the incident.
- Minimize actual and potential damage.
- Restrict knowledge of the incident to authorized personnel.
- Preserve information relevant to the incident.

Corrective Measures

The Chief Executive Officer and Chief Operating Officer will determine and cause to be executed necessary activities in order to quickly restore circumstances to a normalized and secure state of operation. Corrective measures should be designed to:

- Secure the environment.
- Restore the environment to its normalized state.

Notification Required

Any employee with knowledge or a reasonable suspicion of an incident (i.e. theft or diversion) is required to make an immediate report to their unit manager, Security Officer, or Chief Operating Officer and record the incident in the incident report log. All incident activities, from receipt of the initial report through post-incident review, are to be documented by the Chief Operating Officer.

Internal Reporting Required

Reporting will include:

- A summary of the incident providing a general description of events, approximate timelines, the parties involved, resolution of the incident, external notifications required and recommendations for prevention and remediation.
- A description of incident events, indicating specific timelines, persons involved, hours spent on various activities, impact to affected parties, ensuing discussions, decisions and assignments made, problems encountered, successful and unsuccessful activities, notifications required or recommended, steps taken for containment and remediation, recommendations for prevention and remediation (short-term and long-term), identification of policy and procedure gaps, results of post-incident review.
- All relevant documentation will be retained by the Chief Operating Officer for archival in a cloud storage repository. Access to the documentation and repository is typically restricted to executive management and unit managers.
- Incidents will be documented by the Chief Operating Officer in accordance with the company's recordkeeping policies.

OCU and Law Enforcement Reporting Required

The Chief Operating Officer will immediately notify the OCU and appropriate law enforcement authorities as necessary after discovering the following:

- Discrepancies identified during inventory, diversion, theft, loss and any criminal action involving an owner, manager, or an employee that cannot be explained;
- Any suspicious criminal act involving the sale, cultivation, distribution, processing, or production of cannabis by any person known to the company;
- Unauthorized destruction of cannabis;
- Any loss or theft of Derivative Products during transportation;

- An alarm activation or other event that requires response by public safety personnel; and
- Any other major breach of security.
- All documentation related to an incident that is reportable will be maintained and made available to the OCU and to law enforcement authorities acting within their lawful jurisdiction upon request.

Post-Incident Review

A final review of incident-related activities is required.

- The Chief Operating Officer will hold a post-incident review meeting after each incident has been resolved; this discussion should be scheduled within 2-3 weeks of the incident's remediation. All affected parties are recommended participants.
- The review is an examination of the incident and all related activities and events. All activities performed relevant to the incident should be reviewed with an eye towards improving the over-all incident response process.
- Recommendations on changes to policy, process, safeguards, etc. are both an input to and by-product of this review. All discussion, recommendations and assignments are to be documented for distribution to the Chief Executive Officer and follow-up by the Chief Operating Officer.

Incident Closure

The Chief Operating Officer will stay actively engaged throughout the life of the incident to assess the progress/status of all containment and corrective measures and determine at what point the incident can be considered resolved. Recommendations for improvements to processes, policies, procedures, etc. will exist beyond the activities required for incident resolution and should not delay closing the incident, but will be implemented by the Chief Executive Officer.

CONTAINMENT ACTIVITIES

Incident Containment

The Chief Operating Officer will determine and execute the appropriate activities and processes required to quickly contain and minimize the immediate impact to the company, our customers and other stakeholders. The information below is a guideline for response and containment in various situations; however, all employees will use their best judgment when determining appropriate actions during an emergency incident. The health and safety of all persons will be the primary driver of any decision. Containment activities are designed with the primary objectives of:

- Counteracting the immediate threat.
- Preventing propagation or expansion of the incident.
- Minimizing the actual and potential damage.
- Restricting knowledge of the incident to authorized personnel.
- Preserving information relevant to the incident.

Fire

If the fire does not present an immediate danger to personal safety, one employee may try to extinguish the fire while one other employee stands-by, calls 911 and directs others out of the facility.

Natural Disasters

- Determine the extent of the disaster and need for evacuation or sequestration.
- Follow any direction given by local officials or law enforcement.
- Terminate all non-essential work functions and post necessary closure notices.
- Take precautions to secure all Derivative Products from the environment or possible looting.

Chemical Spill/Gas Leak

Chestnut Hill Tree Farm does not utilize any highly toxic chemicals in its operations. Gas leaks in any facility require an immediate evacuation until the fire department clears the facility. Gas leaks may include natural gas, CO_2, or propane. Any employee discovering a gas leak should shut off the gas source immediately and notify the unit manager to begin evacuation procedures. Nutrient spills are addressed in the cultivation policies. Employees should follow the direction of local officials in the case of an external spill impacting operations.

Evacuation Protocols

Any manager may determine the need to evacuate an area. Any employee is authorized to evacuate an area in a life threatening incident. Reasons for evacuation may include:

- Fire.
- Bomb threat.
- A hostile or violent employee, customer, visitor or unknown person.
- Power outage.
- Earthquake.
- Water or gas leak.
- Hazardous chemical spill.
- Robbery or hostage situation.

All employees will ensure that patients and visitors do not:

- Use elevators.
- Gather in lobbies.
- Bring disabled individuals into stairwells without fire department approval.
- Open a door without first checking for heat.
- Run or panic.
- Re-enter the building until authorized.

Disabled individuals or others who need assistance should:

- Be assisted by an employee.
- Be evacuated only under the direction of authorized emergency personnel or when there is an immediately threat to personal safety and security (i.e. Fire Department).

If applicable, preserve any and all evidence, if applicable and remain accessible for discussion with law enforcement personnel. Request witnesses to stay or provide their contact information. Do not touch any suspicious items or suspected bombs.

Damaged Cannabis Products

Each unit manager in coordination with the Quality Assurance Officer will ensure that cannabis materials or Derivative Products that have been subjected to improper storage conditions, including, without limitation, extremes in temperature, humidity, smoke, fumes, pressure, age or radiation due to natural disasters, fires, accidents or equipment failures, are not salvaged and distributed and are disposed of in accordance with the company's waste disposal policies. The unit manager may conduct salvaging operations only if there is:

- Evidence from laboratory tests and assays that the cannabis or Derivative Products meet all applicable standards of identity, strength, quality and purity; and
- Evidence from inspection of the premises that the cannabis or Derivative Products and their associated packaging were not subjected to improper storage conditions as a result of the disaster or accident, if any.

[redacted]

[redacted]

- Notify the Chief Executive Officer of disposition of assets and any action taken.

UNAUTHORIZED IT ACCESS OR NATURAL DISASTERS IMPACTING PRODUCT OR EQUIPMENT

Activities that may be required to contain the threat presented to systems where unauthorized access or a natural disaster may have occurred. Engage a third-party IT specialist as needed.

[redacted]

CORRECTIVE MEASURES

Chief Operating Officer Responsibilities

The Chief Operating Officer will determine and cause the execution of the appropriate activities and processes required to quickly restore circumstances to a normalized (secure) state. Third-party security, IT or other necessary advisors should be engaged if necessary. Corrective measures are designed with the primary objectives of:

- Securing the environment, and
- Restoring the environment to its normalized state.

[redacted]

[redacted]

FACILITY CLOSURES

The Chief Operating Officer will manage any required facility closures ensuring that:

- Essential services are maintained to the extent possible even during an emergency.
- Minimum staffing levels are maintained.
- Required stakeholder communications are issued.
- An action plan for provision of essential services restoration of full services is developed and implemented immediately.
- A common area with food and bedding is provided for employees required to perform extended duty.
- Offsite employees support administrative tasks (time entry, scheduling, etc.).
- Non-essential meetings and travel is suspended.
- Telecommuting is implemented for applicable job functions.
- Sufficient and accessible infection control supplies (e.g. hand-hygiene products, tissues and receptacles for their disposal) are provided in all facility areas. Surface cleaning in common areas is sufficient.
- Work is re-prioritized and suspended if possible and contingency plans for major projects are implemented if possible.
- Essential operations are maintained, emergency assignments may be made to non-typical job classifications or third-parties as necessary.

BIOTRACKTHC

Upon propagation, BioTrackTHC automatically assigns a globally unique non-repeatable 16-digit barcode number to every plant. This barcode follows the plant through its entire product life cycle. The system will also track the precise location of every given plant within a designated room, bed or plant table using an 'abc, 123' grid base. Throughout the production process, the licensed producer may enter production notes into the plant-specific inventory record (i.e. events or any required notations that do not currently have pre-defined fields within the system). Upon harvest the system will batch designated plants together and assign a unique barcode to the collection, although the plants are grouped together during the harvest the individual plant barcodes are associated and cataloged within the batch inventory details. All flower, waste, sugar leaf, and other material will be collected, measured and associated appropriately to the original plant barcodes. These weights are also entered using vertically integrated scales to diminish the possibility of human error or manual manipulation. The system can also record both the wet and dry weights of flower material to track moisture loss percentages. The product can be notated and sampled at this juncture for testing purposes. Once testing results are retrieved, they can be directly associated with the product batches.

BATCHMASTER

Propagated cannabis source material is tracked in the same way all other inventory is tracked. BioTrackTHC does not provide a manufacturing module. As a result, the company has selected to utilize batch production software to track manufacturing activities. BatchMaster Product Management is an integrated process manufacturing ERP application suite. It provides for the R&D or Quality Assurance departments in ERP systems like BioTrackTHC designed primarily around Distribution and Supply Chain Management. BatchMaster will be operated as a standalone environment. BatchMaster Product Management contains all the functionality required to develop and define products, comprising the following modules:

- Inventory Items, full definition including multiple user-maintained costs.
- Formulation, including labor & overhead costs, by-products and co-products, and more.
- Laboratory formulation, allowing on-screen product development to physical properties.
- What-if Costing, providing the facility to design products to target costs.
- Bill-of-Material definition of finished goods, combining formulas with packaging.
- Quality Control definition at every level from raw material / ingredient, to formulas / recipes, to finished products.
- MSDS generation module that can compile any variation of compliance documents.

The system provides for comprehensive inventory item definitions featuring:

- Multiple classification methods.
- Unlimited units of measure, automatic weight, and volume conversions.
- Material property specifications and values.
- CAS Number master file.
- Material Health & Safety and SARA data.
- Hazard information and MSDS paragraphs.
- Additional MSDS numeric (non-lab calculation) data.

BatchMaster also allows the company to manage its recipes and formulas within the system, another feature that BioTrack THC cannot provide. The system:

- Manage losses at formula or line level.
- Maintains central standard instructions and master and batch production records.

- Provides cost elements at formula and line levels.
- Maintains full revision history with facilities to view, compare with, revert to, and purge prior revisions.
- Provides bulk rules-based material substitutions.
- Secures formulations.
- Calculates intermediate expansion and Intermediate density roll-up.
- Attachs Standard Operating Procedures.

A detailed description of inventory control policies is provided in the following section.

BIOTRACKTHC

Upon propagation, BioTrackTHC automatically assigns a globally unique non-repeatable 16-digit barcode number to every plant. This barcode follows the plant through its entire product life cycle. The system will also track the precise location of every given plant within a designated room, bed or plant table using an 'abc, 123' grid base. Throughout the production process, the licensed producer may enter production notes into the plant-specific inventory record (i.e. events or any required notations that do not currently have pre-defined fields within the system). Upon harvest the system will batch designated plants together and assign a unique barcode to the collection, although the plants are grouped together during the harvest the individual plant barcodes are associated and cataloged within the batch inventory details. All flower, waste, sugar leaf, and other material will be collected, measured and associated appropriately to the original plant barcodes. These weights are also entered using vertically integrated scales to diminish the possibility of human error or manual manipulation. The system can also record both the wet and dry weights of flower material to track moisture loss percentages. The product can be notated and sampled at this juncture for testing purposes. Once testing results are retrieved, they can be directly associated with the product batches.

INVENTORY CONTROL

The Chief Operating Officer is assigned responsibility for the oversight of all inventory management activities and for implementing and enforcing the company's policies and procedures. All managers will work collaboratively to assure that inventory is tracked from seed to sale, counted and recorded at required intervals, and that any discrepancies are reported to the appropriate authorities.

The company's inventory management and point of sale systems will be accurate and capable of producing, upon request, reports on all cannabis and products in production, finished and stored. Cycle counts are required and will be recorded in the inventory log. Required shift, daily, weekly, monthly, semi-annual, and annual inventory counts in the dispensary, cultivation, and manufacturing facilities will be executed. All inventory policies and procedures relevant to the acquisition, receipt and distribution of cannabis are comprehensively addressed.

Discrepancies identified during inventory counts that are not due to documented causes will be reported to the Chief Operating Officer and the causes will be investigated. Any suspected cases of diversion, theft, loss, and any criminal action involving the company or an employee will be reported to the Chief Operating Officer. The Chief Operating Officer will also report any verifiable incident of theft or loss of cannabis to the OCU and law enforcement, as necessary.

RESPONSIBILITY FOR INVENTORY CONTROL

- The Chief Operating Officer is responsible for oversight of all inventory management and control.
- The Chief Operating Officer shall designate in writing an employee who has oversight of the inventory control system for each licensed company facility under the Inventory Manager's supervision.
- Unless otherwise designated by the Chief Operating Officer, each unit manager is responsible for the accurate recording of all inventory transactions in their unit.

INVENTORY LIMITS

- The Chief Operating Officer will ensure the cumulative inventory cannabis materials is maintained in accordance with regulations.
- Beginning inventories for each unit shall be established based on demand projected in the business plan of company.
- Inventory limits shall be adjusted by the Chief Operating Officer in coordination with the unit managers to anticipate future inventory needs.

REAL-TIME INVENTORY REQUIRED

- The Inventory Manager, in coordination with the unit managers, is responsible for the accurate real time reporting of cannabis inventory.
- The system utilized in each location will report daily beginning and ending inventory including:
    1. Cannabis plants in any phase of development such as propagation, vegetation and flowering;
    2. Cannabis ready for dispensing;
    3. Derivative Products in process;
    4. Derivative Products ready for dispensing;
    5. All damaged, defective, expired or contaminated cannabis and Derivative Products awaiting disposal;
    6. Acquisitions;
    7. Harvests;
    8. Sales;
    9. Disbursements; and
    10. Disposals of unusable cannabis.

INVENTORY CONTROLS AND PROCEDURES

- The Chief Operating Officer in coordination with the Inventory Manager and unit managers shall regularly conduct inventory reviews and comprehensive inventories of all cannabis and Derivative Products in production, finished and stored.
- A seed-to-sale methodology will be utilized by the company at all times.
- The Chief Operating Officer shall make all necessary changes to procedures and re-train personnel immediately upon discovering a problem in inventory management procedures.
- Each unit manager shall maintain an inventory log to record:
    1. The date of an inventory process;
    2. A summary of the inventory findings; and
    3. The names, signatures and titles of the individuals who conducted the inventory.

INVENTORY RECORDKEEPING

- The Inventory Manager will oversee the documentation of all inventory procedures in coordination with the unit managers to be reviewed by the Chief Operating Officer.
- The company will utilize a cloud based document management system and server based inventory control system, BioTrackTHC.
- All inventory documentation required will be retained by each facility for at least five years.
- Records will be made available to the OCU upon request as required.

RECEIVING

RECEIVING CANNABIS AND DERIVATIVE PRODUCTS

- Immediately upon arrival to any company facility, two employees, designated by the unit manager as able to receive inventory, will re-weigh, re-inventory and account for on video and in the inventory system all cannabis and Derivative Products.
- Containers should be physically examined for evidence of tampering.
- Any products that show evidence of tampering or that are not accompanied by the appropriate documentation will be rejected and may not be received into inventory.
- The unit manager will be notified immediately of any shipment refused or that needs to be returned.
- Each employee will confirm by signature the accuracy of the delivery invoice, identification numbers, number of containers, the total inventory count received and the accuracy of the entry of the inventory into the inventory management system or point of sales system.
- All cannabis product will be accompanied by the name and license number of the cultivation facility, the lot number, net weight, associated laboratory test results, and a list of all pesticides applied to the product.

DISCREPANCIES

- Any discrepancy will be reported to the unit manager immediately to be investigated and resolved with the originator of the shipment.
- Unresolved discrepancies will be reported to the Inventory Manager as required by the company's recordkeeping policies and procedures.

RECEIVING PRODUCT INTO THE POINT OF SALE SYSTEM

- Receipt of cannabis, Derivative Products and cannabis plants will be recorded in the inventory control system.
- The following information will be recorded:
    1. A description of the Derivative Products acquired, including the amount, strain and batch number and all testing data provided;
    2. The name and identification number of the license of the facility shipping the Derivative Products;
    3. The name and identification card number of the employee delivering the Derivative Products;
    4. The name and identification card number of the employee receiving the Derivative Products on behalf of the unit; and
    5. The date of acquisition.

MANUFACTURING INVENTORY

- The Chief Operating Officer will ensure that the inventory management system is maintained and provides adequate documents the flow of materials through the manufacturing process.
- The Chief Operating Officer in coordination with the unit managers will maintain procedures which reconcile the raw material used to the finished product on the basis of each job.
- Significant variances will be documented, investigated by the unit manager and immediately reported to the OCU as needed.
- The Chief Operating Officer will cause a quarterly physical inventory count performed by persons independent of the manufacturing process under the direction of the unit manager which are reconciled to the perpetual inventory records.
- Significant variances are to be documented, investigated by the Chief Operating Officer, and immediately reported to law enforcement as needed.

INVENTORY COUNTS

Cycle Counts Required

- The Chief Operating Officer shall direct unit managers to perform inventory counts on a regular basis utilizing a cycle count method.
- A cycle count requires the unit manager perform a complete count of the inventory over a period of time counting inventory groups (i.e. clones, mothers, flowering by room, finished flower, curing flower, edibles, topicals, etc.) individually.
- Each unit manager shall ensure that cycle counts are completed on schedule with minimal possible impact on regular operations.
- The same employees shall be assigned to recurring inventory groups whenever possible. However, employees should not consistently be responsible for one inventory area.
- The unit manager will review any discrepancies and approve all inventory management system adjustments.
- Discrepancies identified during inventory, diversion, theft, loss and any criminal action involving company or an employee; will be reported to the Chief Operating Officer and the OCU in accordance with the company's recordkeeping policies.
- All counts will be recorded in an inventory log and entered into the inventory management system or point of sale system immediately if counted on paper or by recording device.

Required Counts in the Manufacturing Facility

- Shifts counts – cannabis ingredients used during the shift and all in process Derivative Products
- Daily counts – total cannabis ingredients used during the day and all in process Derivative Products
- Weekly counts – Derivative Products in storage and in process Derivative Products
- Monthly counts – complete inventory
- Semi-annual counts - complete inventory with second count
- Annual counts - complete inventory with second count witnessed by the Chief Operating Officer

REPORTING

Inventory Discrepancies

- If the unit manager identifies a reduction in the amount of cannabis in the inventory of the cannabis establishment not due to documented causes, it will be reported to the Inventory Manager and Chief Operating Officer.
- The Inventory Manager in coordination with the unit manager shall determine where the loss has occurred and take and document corrective action.
- If the reduction in the amount of cannabis in the inventory is due to suspected criminal activity by an employee, the Chief Operating Officer shall report the employee to the appropriate law enforcement agencies as required by regulation.

Theft and Loss

- If any loss or theft is verified, it will be documented by the Chief Operating Officer and reported to the local enforcement agency and OCU as necessary by regulation or at the Chief Operating Officer's discretion.
- Documentation of the theft or loss will be maintained for at least five years and provided to law enforcement or the OCU upon request.

CANNABIS PRODUCT STORAGE

The inventory management system will be used to document cannabis and Derivative Products in storage. Product storage requirements established by the company are thoroughly addressed, with measures included to ensure adequate lighting, ventilation, temperature, humidity, space, and equipment. Separate areas for storage of cannabis that is outdated, damaged, deteriorated, mislabeled, or contaminated, or whose containers or packaging have been opened or breached, are identified and described.

The Chief Operating Officer will be responsible for developing, implementing and maintaining storage area procedures for each unit that ensure compliance with required processes contained herein. Each unit manager is responsible for establishing control areas or systems to prevent product contamination during the production process. The four secure storage locations used during cultivation processing are discussed and those with access are listed.

It is established that all storage areas will be maintained in a clean and orderly condition, free from infestation by pests of any kind and in accordance with security requirements established by the company. All safes, vaults, and any other equipment or areas used for the production, cultivation, harvesting, processing, or storage of cannabis and Derivative Products will be securely locked and protected from entry at all times. [redacted]

PRODUCT STORAGE

General Storage Requirements

The Chief Operating Officer in coordination with unit managers and quality control unit is responsible for ensuring compliance of all storage areas.

- All cannabis and Derivative Products will be stored in an enclosed and locked facility where no toxic or flammable materials are kept.
- Adequate lighting, ventilation, temperature, humidity, space, and equipment will be provided in all cannabis and cannabis product storage areas with oversight by the quality control unit.
- Separate areas for storage of cannabis that is outdated, damaged, deteriorated, mislabeled, or contaminated, or whose containers or packaging have been opened or breached, until such products are destroyed will be provided in each unit.
- All storage areas will be maintained in a clean and orderly condition.
- All storage areas will be kept free from infestation by insects, rodents, birds, and pests of any kind.
- All storage areas will be maintained in accordance with security policies and procedures.

Secure Product Storage Required

The Chief Operating Officer in coordination with the Security Officer and unit managers shall be responsible for monitoring and restricting access to secure storage of cannabis. The Chief Operating Officer shall develop, implement, and maintain storage area procedures that ensure the following processes:

- All cannabis in the process of cultivation, production, preparation, transport, or analysis will be housed and stored in such a manner as to prevent diversion, theft, or loss.
- Any cannabis items such items will be accessible only to the minimum number of specifically authorized employees essential for efficient operations.
- Access to Derivative Products will be restricted by the Chief Operating Officer. Only necessary personnel will receive access rights to areas housing security equipment, cannabis, Derivative Products or cash.
- All cannabis and Derivative Products will be returned to a secure, locked area at the end of any process (i.e. trimming, manufacturing, etc.) or and at the end of the day (i.e. dispensary products on display).

- All cannabis and Derivative Products will be stored separately with suitable identification the labels and other labeling materials for each type of cannabis or cannabis product, and the different strength, dosage form or quantity of contents.

Product Storage Areas Security

All employees will ensure that safes, vaults, and any other equipment or areas used for the production, cultivation, harvesting, processing, or storage of cannabis and Derivative Products are securely locked and protected from entry at all times, except for the actual time required to remove or replace cannabis. The Security Officer will ensure that adequate surveillance of storage area is provided and the camera's field of view is not be obstructed.

Environmental Control Required

The Chief Operating Officer in coordination with the quality control unit and unit managers will ensure that storage areas holding cannabis and Derivative Products are maintained to be dry, well ventilated, and have sufficient insulation or other temperature-control features to avoid extreme temperature fluctuations.

- The company shall incorporate a humidifier or de-humidifier if needed to ensure product quality.
- Storage areas will utilize and maintain carbon filtration or other means of odor control as necessary.

High Contamination Risk Storage and Transportation

Products that can support the rapid growth of undesirable microorganisms as determined by the unit manager or quality control unit will be held in a manner that prevents the growth of these microorganisms.

- Storage and transportation of finished products will be under conditions that will protect them against physical, chemical, and microbial contamination as well as against deterioration of them or their container.
- The unit manager and transportation manager in coordination with the quality control unit will ensure that all high risk products are safely stored and transported.

PRODUCTION AND PROCESSING STORAGE

Production Storage

The Chief Operating Officer is responsible for the oversight of product storage in all units. The Inventory Manager will ensure the separate or defined areas or other comparable control systems are utilized to ensure the prevention of contamination or miscalculation or misuse of any component in any step of the production process including cultivation, manufacture, processing, packaging, labeling, storage or distribution of cannabis or Derivative Products. These control areas will be established for:

- Receipt, identification, storage and withholding from use of components, product containers, closures and labels, pending the appropriate sampling, testing or examination by the quality control unit before release for manufacturing, processing or packaging;
- Holding rejected components, product containers, closures and labels before disposition;
- Storage of released components, product containers, closures and labels;
- Storage of in-process materials;
- Processing operations;
- Packaging and labeling operations;
- Quarantine storage before the release of cannabis or Derivative Products; and
- Storage of cannabis or Derivative Products after release.

In-Process Storage

If a production process cannot be completed by the end of a working day, the employee responsible for closing the facility will ensure the processing area, or containers containing cannabis are locked inside an area or building with adequate security approved by the Security Officer.

MONITORING AND RECORDKEEPING

The Cultivation Director will monitor the daily operations of the cultivation facility. Any practice or procedure that results in non-compliance, inefficiencies, or sub-standard medical Derivative Products will be revised and the necessary retraining scheduled. The Chief Operating Officer will approve recommended procedural changes. Cultivation records will at a minimum:

- Fully disclose all activities and transactions of the cultivation operation in sufficient detail as to be readily understood and audited;
- Be maintained for no less than five years;
- Be sufficient to demonstrate compliance with applicable regulations; and
- Be made available for inspection and copying during normal business hours by authorized representatives of the business, law enforcement, and the OCU.

Inventory records will include the quantity of cannabis materials at the processing facility including all in-process materials on a daily basis as outlined in the company's inventory policies and procedures. Disposal records will include the disposal method used for any cannabis products that are not finished, including evidence of the disposal of the cannabis in accordance with waste disposal policies and procedures. The Manufacturing Director will assign data entry tasks to qualified and trained employees. Required manufacturing documentation may be recorded in BioTrackTHC, BatchMaster, intranet logs, or paper logs as determined by the Manufacturing Director and includes. All data maintained in the manufacturing management systems will be kept for at least five (5) years after the batch has been distributed. The Manufacturing Director will oversee the accuracy and maintenance of all records.

Data collection will be compliant with all company policies and procedures, state law and regulation, and will include for OCU and internal tracking purposes the names, initials, or employee identification numbers of the individuals who processed, extracted packaged, and labeled the medical cannabis. Inventory management systems including BioTrackTHC provides additional opportunities to increase control over medical cannabis products. The Inventory Manager will review all inventory transactions in accordance with the following protocols:

- All inventory movement will be reviewed every ten days.
- Targeted inventory levels for products that have passed lab testing, inspection, and approval should be set for a 30-day re-supply value, or the amount of inventory needed to cover consumption over a period of 30 days.
- Targeted inventory levels will be built, stored, and managed to build a year's worth of inventory. This inventory amount target will be based on the first 90 days of sales plus 30%.

SYSTEM AUDITS

All unit Directors will perform a periodic review of system administrators and responsible personnel to prevent diversion opportunities. Audit procedures will ensure a full inventory of medical cannabis products in each location monthly, as a minimum requirement. The Quality Assurance unit will develop and employ standard deviation measures utilizing historical data to evaluate the activities of all system users and purchases.

Any inventory discrepancies discovered will be reported to the Security Officer. Any discrepancies discovered during a shift will be resolved before the end of the shift. The Security Officer will report all unresolved inventory discrepancies to the OCU and law enforcement authorities as necessary. The Manufacturing Director and the Security Officer will monitor unresolved inventory discrepancies on a daily basis. The Chief Operating Officer will approve the reconciliation entry of any inventory discrepancy.

REPORTING

The Manufacturing Director will ensure that all inventory management systems used in manufacturing operations can provide reports that detail:

- A “total inventory in storage” by lot and batch number for each form. An “all events” report will provide detail on all user activity and transaction types within a time frame, and will be able to be tailored to specific data requirements, such as individual items or users.
- A “controlled substances vault compare” report will allow administrators to cross-reference the inventory that leaves the holding area and arrives at the processing facility, or any other location to the inventory at that location. Transactions that do not match show up on this report by location, item, quantity, date, time, and user.
- A “review send” report will provide detailed information regarding the removal of medical cannabis products from the storage areas, specifying the user, time, date, item, quantity, and intended destination.
- A “processing” report will provide detailed information regarding the processing of medical cannabis at the facility, indicating the user, time, date, item, quantity, and inventory movement at the dispensing facility.
- A “purchase history” report helps to trend the receipt of medical cannabis into inventory and monitor production patterns.
- A “proactive controlled substances diversion” report isolates above-average processing of controlled substances, as determined by standard deviation.

Part 3.B.4.h. Vehicle tracking systems

[redacted]

[redacted]

BIOTRACKTHC

The BioTrackTHC system provides redundancy for the Arbitrator system. Transportation manifests are featured in the system to monitor turn-by-turn directions and provide an estimated route time. The entire logistics process is tracked, permitting the surveillance of every order from door to door. The transporter establishes a set route that can be viewed by authorized users. Way-points can be generated just in case the transporter places an audit on the shipment midway through the transport. BioTrackTHC's transport documentation provides the following:

- Employee identity and badge number
- Vehicle vin number

- Time stamped batch/lot number
- Total quantity being transported

EMPLOYEE SCREENING AND MONITORING

It is critical for the security of the company that only the most qualified, credible, and talented people are hired to help avoid workplace theft, fraud, or violence. It's equally important for the company to conduct background screening on the contingent workers, including cleaning crews, facilities maintenance workers, auditors, and other contractors who have access to the company's property or represent the company. Knowing the background of these workers is required to protect the integrity of the company, as well as the safety of patients. Therefore, this workforce needs to be screened with the same due diligence as any other employee.

To help attract, hire, land, and retain the best employees the company has developed employment screening and monitoring processes to create a candidate experience that benefits potential employees and reduce company risk by utilizing a fast, scalable, and compliant background screening solution.

PRE-SCREENING POTENTIAL CANDIDATES

The Human Resources Manager will pre-screen candidates by stating clearly to potential applicants what items and prerequisites will be needed to properly qualify the employment application. This will streamline the company's application process by having applicants review the information and then determine whether or not they meet the qualifications. This is part of the proactive pre-screening process that ensures applicants who submit their information will pre-qualify based on the specific information needed later in the process.

Chestnut Hill Tree Farm will integrate instant and automated employment screening products into the hiring process.

- Instant searches will be used to efficiently move forward in the hiring process by quickly confirming or validating basic information such as a Social Security number or name and address history.
- Automated searches will provide electronic delivery of process updates and results, eliminating time delays often associated with manual follow-up on important screening components such as employment or education verifications.

COMPLIANCE

The Human Resources Manager will ensure compliance with local, state and federal laws regarding the hiring and employment screening processes. The most prominent legislation the company will abide by is the Fair Credit Reporting Act ("FCRA"). The company will consult legal counsel regarding local state and federal laws, and related employment law matters.

REDUCING RISK

An efficient, thorough employment screening process can, above all else, help reduce the company's overall workplace risk. Identifying risk early, prior to hiring an employee, protects the organization from risk related to:

- Physical Safety
- Financial Security
- Organizational Image or Reputation
- Legal Compliance

EMPLOYMENT SCREENING PROCESS

Criminal History

The company will screen candidates for criminal records to promote a safe, secure workplace by reducing employment-related risk linked to a criminal history. The following searches may be performed depending upon the type of position the candidate is seeking.

- Member-Contributory Theft Information Database – the company will use a member based program where companies share employee theft and shoplifting information to identify applicants with a history of internal theft. The database is built from member contributions and be available exclusively to member organizations. Member contributions are typically proprietary records and not found through traditional public record sources.
- National Criminal File Search – Some vendors can offer access to a nationwide database of criminal records gathered from across all 50 states. A variety of sources are utilized including Sex Offender Registries, state and county criminal courts and state-level departments of corrections. This search can provide instant results depending on the provider.
- Felony and Misdemeanor Search – This county courthouse search includes a search of all felonies and misdemeanors on all indexes available at the main county seat court location.
- Motor Vehicle Report – A Motor Vehicle Report ("MVR") reveals the status of an applicant's driver's license and any violation history. This search should be conducted on all candidates who will have driving responsibility for a company, including those who will not only drive a company vehicle but will also drive a personal vehicle on company time or for company purposes.

Verification and Qualification

The Human Resources Manager will utilize the following solutions depending on the level of security required for the position.

- Social Security Number Verification ("SSNV") – This search matches the input information against millions of consumer header credit files contained in the databases of nationwide credit reporting agencies. The SSNV returns other names and addresses associated with the identifying information used to request the report.
- Credit Check – This search matches the candidate's information to information held by the Credit Bureaus, and returns the candidate's credit report.
- Employment Verification and/or Education Verification – These two products are used to verify the information provided by the candidate.
- Employment Eligibility – An employment eligibility verification service will be used to streamline the Form I-9 process. The company will participate in the E-Verify program to confirm every new hire's employment eligibility by sending the information used to complete the I-9 through the Social Security Administration ("SSA") and Department of Homeland Security ("DHS") databases.

Occupational and Biometric Services

Chestnut Hill Tree Farm will utilize a drug testing service provider who will track results, provide reports, and ensure the company stays in compliance with the law. The service provider will:

- Assist the company in developing or updating drug testing policies
- Coordinate and store your Driver Qualification Verification files
- Meet your immunization and medical exam requirements including receiving the exam results

A basic DOT Five Panel Drug Test (urine conventional) will be used. The following drugs will be tested from the applicant's urine sample:

- Amphetamines (Amphetamine, and Methamphetamine)
- Benzoylecgonine (Cocaine Metabolite)
- Cannabinoids (Marijuana Metabolite, and THC-COOH)
- Opiates (Codeine, and Morphine)

- Phencyclidine ("PCP")

Adjudication and Alerts

Chestnut Hill Tree Farm will provide a criminal records adjudication policy as part of the screening process. FCRA-mandated Adverse Action letters for candidates that fail to meet specific screening criteria set forth by the organization will be delivered to candidates.

MONITORING EMPLOYEES

A monthly compliance exception report is completed for the employment screening process. The report informs the Human Resources Manager which candidates have completed various parts of the screening process and which have not. The report also updates the company to which components are missing from a candidate's employment screening process.

The Human Resources Manager will cause all required criminal and drug screens to be updated every two years. Employees are required to notify the company whenever they have any type of encounter with law enforcement. The Human Resources Manager will determine if a Level 2 background screening should be performed upon the employee's notice. A post-accident drug screening may be performed at the Human Resources Manager's discretion or if required for worker's compensation purposes.

Video monitoring of employees occurs in the normal course of operations. Additional footage may be reviewed if any employee is suspected of theft or diversion. The company will notify law enforcement of any employee determined to have stolen any medical cannabis whether plant or product form. Employee performance is monitored by their immediate supervisor and documented in accordance with the company's staffing policies.

Each unit Director is ultimately responsible for all staff in their respective unit. Each Director will be familiar with the layout and technical specifications of the facility, all equipment utilized, and able to perform and train others to perform all activities necessary in the facility. The company is dedicated to training all employees to excel in their position through on-the-job training and classroom learning opportunities. Third-party training will be provided when determined to be beneficial by the Director and may include training on personnel safety, food safety, GMP, good agricultural practice, and other management practices.

All employees will receive employee manuals prior to employment. The employee manual provides in-depth training for cultivation policies and procedures. Each unit Director is responsible for ensuring that each employee has received, read, and acknowledged their understanding of the material covered in the employee manual. All manufacturing employees will be trained by their unit Director and will be required to continually demonstrate a working knowledge of training materials as a condition of employment. All employees are required to have a working knowledge of all production standards established by their Directors for medical cannabis production.

Any changes to SOPs will be approved by the OCU and communicated to all manufacturing facility employees. An acknowledgement of understanding will be documented for each employee. Training on SOP changes will be provided as necessary. The company is dedicated to training all employees to excel in their position. It is company policy to ensure that all employees receive professional and appropriate training on compliance with state law, the therapeutic use of medical cannabis, safety, security, incident management, and diversion and theft prevention. No employee may work on-site prior to receiving orientation training or when any required critical training is past due.

BIOTRACKTHC MONITORING

The system prevents unauthorized system access or actions via user PIN, fingerprint scan, or username and password. Every system action records not only the effect of the action, but a timestamp and the identity of the system user performing the action, providing a full auditable trail that is retrievable at any time, and may be produced in BioTrackTHC's reporting tool (e.g., Forensics Report). These accountability features enable a user to identify the reasons behind any discrepancies, should any unexplainable material losses occur.

BIOTRACKTHC

BioTrackTHC has a biometric chain of custody module that logs every action in real time and the user who performed that action. BioTrackTHC has the ability to integrate with scales to deter employee theft and human error. Every action is time stamped which can be cross referenced with security cameras. All of these functions prevent diversion, abuse, and illegal or unauthorized conduct relating to medical cannabis.

PERSONNEL

In addition to the specialized cannabis tracking system, BioTrackTHC, the company has a large pool of expertise available for tracking purposes. These experts include:

BRADY BLAKE - CONSULTANT

As a quality control manager at Colorado Alternative Medicine, Blake gained extensive experience implementing and operating Colorado's State mandated tracking software system, Marijuana Inventory Tracking System, which efficiently tracks each crop from seed-to-sale. He believes his experience using the company's prior point-of-sale inventory software program, MMJ Freeway, provided a smooth transition to the use of a more advanced and efficient technology base. In 2013, Blake was promoted to a senior management position. He became responsible for the care and tracking of over 4,000 plants and approximately twenty new employees in a grow facility housing 240,000 watts of flower production.

CODI COLEMAN – CULTIVATION DIRECTOR

As a leader in quality assurance and cannabis production, Coleman begins his cultivation process by tracking and labeling each product from the moment the crop is propagated. He applies a seed-to-sale system to keep track of each plant he harvests. His methods involve full compliance to all laws and regulations.

JILL LAMOUREUX - ADVISOR

Jill Lamoureux has been a cannabis industry frontrunner in the State of Colorado since 2008, when she and her husband created one of the Colorado's most respected multi-location dispensing operations. Their branches of business consisted of four retail stores, three cultivation operations, and one cannabis kitchen. As a former dispensary and cultivation owner and operator, she brings first-hand experience with tracking all cannabis plants grown in a particular harvest. In 2010, Lamoureux worked with the State of Colorado's Medical Marijuana Enforcement Division (MMED) to develop the first statewide medical cannabis regulations regarding tracking, transparency reporting, and compliance. These regulations required every cannabis-producing plant to be tracked by the MMED through each stage of its life, from cultivation to point of sale. Since 2013, Lamoureux has served as a subject matter expert consulting to the BOTEC Analysis Corporation in cannabis regulation and policy. Recently, she provided aid to the BOTEC team advising Washing State on rule-making issues for recreational cannabis operation, including regulations concerning tracking cannabis crops from seed

Part 3.B.4.k. Personnel reserved solely for inventory control purposes

The Inventory Manager will report directly to the Chief Operating Officer. The role oversees all inventory operations in the company. The Inventory Manager role will be filled by R. Dunstan Wallace II. Wallace shall assist the company in all inventory control processes. Wallace holds a Bachelor's Degree from the University of Florida where he graduated in accounting. He began working with Chestnut Hill Tree Farm in 2011, building complete websites for consumer retail and marketing. Additionally, he has extensive experience developing Quick Books accounting software for companies, and currently serves as a staff accountant at the University of Florida.

The Inventory Manager will work closely with the Chief Financial Officer to ensure that all inventory policies and procedures are sufficient to provide a true and accurate accounting of all cannabis plants, materials, and finish product at all times.

Part 3.B.4.l. Personnel reserved solely for security purposes

John Powell will serve as the company's Security Director. Powell is an experienced law enforcement and public safety professional with a solid academic foundation who has progressively served at all levels with increasing responsibility and accountability gaining real life experience and professional training. This experience enables effective operations in planning, asset allocation, diversity/gender awareness, personnel management and negotiations, strategic planning, tactical response, organizing, recruiting, budgeting, succession planning and relationship building. As a former Maricopa County Protective Services Department Director and Director of Florida's Division of Alcoholic Beverages and Tobacco department, Powell brings a strong base of anti-diversion, loss prevention, and asset protection knowledge to the Dispensing Organization. His wide-ranging experience in local, federal government, school, and information technology security will be invaluable to the company and its stakeholders.

WASTE DISPOSAL PROCEDURES

SOURCES

Chestnut Hill Tree Farm has a comprehensive system for systematically collecting and properly destroying all materials containing cannabis. The final material disposal will render both finished product and precursor materials completely unrecoverable beyond reclamation. Routine disposal procedures will include company employees to securely transport all materials designated for destruction to the cultivation facility for compost or medical waste disposal. Controlled waste materials for destruction may originate from several sources:

- Cannabis stems or other unusable plant materials generated at the manufacturing site are weighed, labeled and stored in a limited access area until they can be properly destroyed.
- All cannabinoid containing extracts, concentrates, in-process materials and bulk product that cannot be further processed into approvable packaged product are labeled and held under quarantine in a secure storage area until they can be properly destroyed.
- Packaged product determined to not meet the minimum safety standards and specifications for brand consistency or otherwise rejected by Quality Assurance are held under quarantine in a secure storage area separate from any released products until they can be properly destroyed.
- Packaged medical Derivative Products at a dispensing facility that become damaged, short dated or were returned by a customer are securely stored at the dispensing facility until they can be properly transported to the manufacturing site and securely stored until they can be properly destroyed.
- Any products that were subjected to improper storage conditions including but not limited to extremes in temperature, water damage or smoke due to natural disasters, fires or equipment failures are held under quarantine and securely stored until they can be properly destroyed.

CHAIN OF CUSTODY

A rigorous chain of custody shall be maintained to ensure that medical cannabis products that have failed laboratory testing are not released for distribution in compliance with all company policies and procedures. All products waiting for laboratory analysis are held in quarantine. Upon notice of a failed batch, the Quality Assurance Officer will oversee the disposal of the batch in the presence of one witness and under the surveillance of security cameras.

PRODUCT SECURITY AND RECORDKEEPING

[redacted] All batches will be properly labeled for disposal and entered into the inventory management system with a disposed status. The Director must ensure the entire batch is properly recorded in the system as disposed and the entire batch is removed from quarantine and disposed of in accordance with company policies and procedures.

DISPOSAL METHOD

All batches that require disposal will be treated in a manner which renders the medical cannabis product unrecoverable. Any packaging that can be salvaged without any risk of contamination or recycled shall be noted in the disposal record of the inventory management system. Medical cannabis products will be mixed with organic waste such as wood shavings or used plant media incorporating the cannabis waste so that the resulting mixture renders the cannabis waste unusable. Once such cannabis waste has been rendered unusable it may be:

- Disposed of with an appropriately licensed solid waste management facility approved by the Chief Executive Officer; or
- If the material mixed with the cannabis waste is organic material, the mixture may be composted.

STORAGE & TRANSPORT

All medical cannabis materials and finished products will be held under secured quarantine and securely stored until they can be properly destroyed. All of the above cannabis materials and cannabinoid containing products will be transported in a locked and secure storage compartment via a transporting vehicle. All shipments of material designated for destruction shall travel from the manufacturing facility directly to an approved medical waste disposal facility. All transport vehicles will be staffed or accompanied by a minimum of two company employees and at least one company transport team member shall remain with the vehicle at all times until these material are received and quarantined at the designated site.

Chestnut Hill Tree Farm will utilize the services of an environmental waste hauler for laboratory waste, a medical waste hauler for finished products disposal, and will compost cannabis plant materials on-site. The Facilities Manager is responsible for the company's hazardous and controlled substance waste policies and procedures.

FEDERAL, STATE, AND LOCAL REQUIREMENTS

The Facilities Manager will manage the company's waste management program and will ensure compliance with:

- US EPA regulations (40 CFR 260-273)
- Florida Department of Environmental Protection regulations
- DEA Disposal of Controlled Substances regulations
- All other applicable regulations

WASTE DISPOSAL LOG

All waste disposed of will be recorded in the waste disposal log including:

- The date of disposal;
- The type and quantity disposed of;
- The manner of disposal; and
- The name of the employee, patient, or caregiver who supplied the waste if applicable.

LIQUID WASTE REQUIREMENTS

Liquid waste containing nutrient residues, cannabis, or by-products of cannabis processing shall be disposed of in compliance with requirements for discharge into surface water, groundwater, and sewers, or disposed of in an industrial wastewater holding tank.

SOLVENT WASTE

The company has elected to use CO_2 extraction for its cannabinoid processing. The Waters systems selected are closed loop systems that recapture all solvents. No solvent waste will result from these systems.

LABORATORY WASTE

The laboratory will dispose of flammable solvents as well as other waste streams with a certified laboratory waste disposal company. To dispose of any leftover cannabis that was not used in the sample analysis process the lab staff will place that cannabis, products, and containers inside a waste disposal drum. The drum at time of disposal will generally contain about 70% liquid lab waste (flammable solvents, etc.) and about 30% solid waste (containers, vials, plates).

The cannabis and cannabis products that are disposed of are rendered unrecognizable and unusable once inside the drum and saturated in solvent. The waste disposal company will be the last person in the chain of custody as drums are incinerated or disposed of in accordance with state and local laboratory waste disposal guidelines.

The company will be aware of what is being disposed of and will also be aware of the hazards associated with the solvents that are inside the drum and follow all flammable/hazardous solvent disposal procedures as mandated by Florida regulations.

UNAUTHORIZED DESTRUCTION OF CANNABIS

The Chief Executive Officer will report any verifiable incident of unauthorized destruction of cannabis to law enforcement as needed. All company employees will report the unauthorized destruction of cannabis to the appropriate supervisor immediately. Unauthorized disposal of cannabis may be cause for termination.

BIOTRACKTHC

BioTrackTHC's inventory management tools track unusable cannabis (e.g., outdated, damaged, deteriorated, mislabeled, or contaminated) and cannabis waste by weight and barcode throughout every phase of cannabis production as well as returns and recalls in the retail phase. Upon destruction, the system can generate a destruction report. The system also allows for the electronic authentication of the witnesses to the destruction through either a four-digit pin number or a biometric scan. To clarify, BioTrackTHC does not simply delete the data related to the waste; rather, the system evidences the lifecycle of every original plant barcode with an auditable trail to either retail sale or verified destruction.

BIOTRACKTHC

Chestnut Hill Tree Farm has selected BioTrackTHC as the provider of its seed to sale tracking systems. BioTrackTHC provides effective cutting-edge technology solutions for the emerging legal cannabis industry that (1) prevents product theft; (2) assists business owners with running their cultivating, packaging, and retail operations more profitably and to better comply with the law; (3) all without leaving sensitive business and consumer data vulnerable in the cloud. Specifically, BioTrackTHC is the industry's only true seed to sale software system with enterprise resource planning, complete inventory tracking, point of sale, marketing, financial reporting and regulatory compliance features. And because it is a server based system with advanced security features, no one, not even the BioTrackTHC team can access business or consumer information without their permission.

BioTrackTHC was formed in 2007 with the goal of developing software solutions that advance public safety in the medical industry by preventing prescription drug fraud and drug diversion. To that end, BioTrackTHC created biometric based technologies that provide transparent patient access to treatment and medication. The development of biometric medical software technologies led to securing two U.S. technology patents (US 8,086,720 & US 8,335,697) and a Canadian patent (CA 2,715,969). Further BioTrackTHC software has undergone the rigorous SAS 70 internal controls technology audit. Our hands on experience in the industry have led to our consulting and developing systems for the Drug Enforcement Agency ("DEA") and the High Intensity Drug Trafficking Area ("HIDTA") Program.

Most recently, BioTrackTHC ™ was contracted by the State of Washington for the first legal cannabis state monitoring and inventory tracking system in the United States. Development and implementation for the State of Washington traceability system was completed ahead of schedule. From our experience and understanding of governmental regulations, in 2010 we went on to shift our focus and create and develop the premier commercial seed-to-sale tracking software solution tailored specifically to meet the unique needs of a government regulated industry BioTrackTHC was developed specifically for cannabis tracking and is the only seed-to-sale software vetted by a government agency. BioTrackTHC is both robust, secure, and feature rich enough to be the complete solution for cultivators, processors, and retailers in over 1,100 locations in 18 states, the District of Columbia, and Canada. For over four years, the company has expanded it's footing in the industry by continuing to support governmental agencies by adapting and providing software enhancements that guarantee state specific compliance of BioTrackTHC clients. Our software allows users to easily remain transparent and accountable by maintaining accurate real-time data and sound reporting through an unbreakable audit chain that can easily track the full lifecycle of legal cannabis from production, testing, transportation, destruction, and sale. To date over 400 million grams of cannabis have been traced from seed-to-sale through BioTrackTHC applications.

BioTrackTHC has formed a Collaborative Clinical Development Alliance to help facilitate an easy web patient interface for collecting actionable follow up data related to the ever-evolving cannabis industry. BioTrackTHC has created iKush.com, the first real-time direct to patient web portal for easily locating cannabis dispensing facilities with accurate inventory levels. After a patient is associated and validated by the respective dispensing facility, iKush allows the patient a simplified way to research and pre-order medical cannabis.

Patients will be associated with a specific dispensary and will be authorized by the dispensary in order to participate. Each patient will have their own iKush dashboard upon logging into the website. The dashboard will display patient history with easy to use patient information collection forms. These collection forms will create the foundation for unheralded insight into the long term effects of medicinal cannabis. Our intentions are to continue to evolve and grow with Minnesota Medical Solutions while continuing to lead the industry. The required data collection points will

produce actionable intelligence creating the first real time patient management platform for the cannabis industry. BioTrackTHC is fully HIPAA compliant and has undergone strict SAS 70 DEA certification.

The BioTrackTHC Inventory Management System offers users with a unique solution that tracks every level of the growth process from cultivation to distribution. Every plant, seed or clone is assigned a unique non-repeatable 16 digit barcode number. Once the flower is batched after being harvested, each batch is given a new barcode while still being associated with the original source barcode. Every batch of product is separated in the inventory control module by the individual barcode for complete accountability and recall protocol. BioTrackTHC technology allows the producer to monitor differentiations in the growth process by entering production notes or information that doesn't have pre-defined fields within the software. The real-time feature tracks any data changes made to the system, the person responsible for making the changes and the time it was made.

Waste

Location	Room	Inventory type	User	Date	Quantity
"Grow"House	Drying Room	Stems	gwalorski	06/11/2014 02:18 PM	500.00
"Grow"House	Flowering	Trim	gwalorski	06/11/2014 02:19 PM	250.00
"Grow"House	Drying Room	Stems	gwalorski	06/13/2014 12:01 PM	400.00
"Grow"House	Flowering	Vegetation Trim	gwalorski	06/13/2014 12:02 PM	1000.00
"Grow"House	Drying Room	Sugar Leaf	gwalorski	06/13/2014 01:28 PM	400.00
"Grow"House	Drying Room	Stems	gwalorski	06/13/2014 01:29 PM	400.00
"Grow"House	Flowering	Trim	gwalorski	06/13/2014 01:30 PM	1000.00
"Grow"House	Drying Room	Sugar Leaf	gwalorski	06/19/2014 02:52 PM	700.00
"Grow"House	Drying Room	Stems	gwalorski	06/19/2014 02:54 PM	700.00
"Grow"House	Flowering	Trim	gwalorski	06/19/2014 02:55 PM	400.00

Notes **Strain Notes** **Additives**

Individual Note Group Note

Date	Phase	User	Subject
08/05/2014	Flowering	gwalorski	watered the room
08/28/2014	Flowering	gwalorski	Watered the room

Watered the room

New Save

Every step of the supply chain is tracked with real-time solutions. The inventory conversion features are fully tracked and documented by the Inventory Forensics Report, dispensed logs and Sales Reports. Once the product is selected for distribution, it is priced and sold to a patient using the customer point-of-sale screen within the system. BioTrackTHC enables the business to collect, store, and retrieve all data and activity. All inventory records, patient records, recall reports, sales/transaction records, product disposal records, and all scanned documents can be accessed at any time (real time), either in-system or through the report creation tool. Though system actions can be adjusted or voided, at no time is any data ever fully deleted as BioTrackTHC maintains a log of every action,

including adjustments and voids, so that the entire history of the system may be reconstructed. The availability and report ability of the system data enables the said entity to produce any information necessary for an inspection.

BioTrackTHC can adjust inventory and always requires a reason for removal when utilizing the inventory adjustment feature. Product in need of quarantine can be separated from bulk and placed in the designated area. Inventory destruction can be initiated through the system requiring documentation of destruction purpose and/or approved method as well as the employee performing the action. Although the inventory can be adjusted or voided, at no time is any data ever fully deleted as BioTrackTHC maintains a log of every action, including adjustments and voids, so that the entire history of the system may be reconstructed. The availability and report ability of the system data enables the said entity to produce any information necessary for the OCU during an inspection or at their request.

PERSONNEL

In addition to the specialized cannabis tracking system, BioTrackTHC, the company has a large pool of expertise available for tracking purposes. These experts include:

BRADY BLAKE - CONSULTANT

As a quality control manager at Colorado Alternative Medicine, Blake gained extensive experience implementing and operating Colorado's State mandated tracking software system, Marijuana Inventory Tracking System, which efficiently tracks each crop from seed-to-sale. He believes his experience using the company's prior point-of-sale inventory software program, MMJ Freeway, provided a smooth transition to the use of a more advanced and efficient technology base. In 2013, Blake was promoted to a senior management position. He became responsible for the care and tracking of over 4,000 plants and approximately twenty new employees in a grow facility housing 240,000 watts of flower production.

CODI COLEMAN – CULTIVATION DIRECTOR

As a leader in quality assurance and cannabis production, Coleman begins his cultivation process by tracking and labeling each product from the moment the crop is propagated. He applies a seed-to-sale system to keep track of each plant he harvests. His methods involve full compliance to all laws and regulations.

JILL LAMOUREUX - ADVISOR

Jill Lamoureux has been a cannabis industry frontrunner in the State of Colorado since 2008, when she and her husband created one of the Colorado's most respected multi-location dispensing operations. Their branches of business consisted of four retail stores, three cultivation operations, and one cannabis kitchen. As a former dispensary and cultivation owner and operator, she brings first-hand experience with tracking all cannabis plants grown in a particular harvest. In 2010, Lamoureux worked with the State of Colorado's Medical Marijuana Enforcement Division ("MMED") to develop the first statewide medical cannabis regulations regarding tracking, transparency reporting, and compliance. These regulations required every cannabis-producing plant to be tracked by the MMED through each stage of its life, from cultivation to point of sale. Since 2013, Lamoureux has served as a subject matter expert consulting to the BOTEC Analysis Corporation in cannabis regulation and policy. Recently, she provided aid to the BOTEC team advising Washing State on rule-making issues for recreational cannabis operation, including regulations concerning tracking cannabis crops from seed

PART 3.C. DISPENSING

Chestnut Hill Tree Farm, LLC plans to locate a single dispensary in the immediate vicinity of the Shands Cancer Hospital at UF. The location provides immediate access to the patient population receiving care at Shands. The company will provide a robust state-wide home delivery program providing access to almost every patient in Florida. At the same time, the delivery program allows the company to ramp up naturally without managing multiple locations or lease payments. The location provides convenient access to a large number of patients. The dispensary will feature private consultation rooms and an optional orientation for first time patients. The dispensing plan was designed by pharmaceutical, healthcare, and cannabis industry experts to ensure that all dispensing is compliant, safe, and effective with a focus on the important educational aspects of medical cannabis use

1. TECHNICAL ABILITY

Part 3.C.1.a. Experience interacting with patients

SUSAN BAUMGARTNER, PHARM.D., MBA – CHIEF OPERATING OFFICER

As a professional pharmacist trained in the use and dispensing of therapeutic products for individual ailments, Dr. Susan Baumgartner has extensive knowledge, skills, and experience in educating healthcare professionals and patients on pharmaceutical information and medication use. Susan Baumgartner began her journey in the healthcare field when studying to receive her Doctor of Pharmacy at the University of Florida (a degree she earned with the highest honors). Her father is a clinical pharmacist who inspired her to pursue pharmacy. He cared for patients at Shands Hospital in Gainesville and taught students in healthcare professions at the University of Florida before retiring after more than 35 years of service. Since her training at the University of Florida, Susan served in a number of diverse roles in a top-tier pharmaceutical company, allowing her to contribute to the education of healthcare professionals in a wide range of specialties and patients with a broad range of disease states and health conditions. Throughout her career, she has remained focused on providing quality care to patients and optimizing outcomes of medication use. Dr. Baumgartner's mission has been to improve the health of patients though appropriate medication use and patient engagement. She has experience interacting with patients in a retail pharmacy setting, dispensing products to prevent and treat diseases, and providing medication use counseling as needed for the best therapeutic outcomes. Dr. Baumgartner will provide oversight for the dispensing operations of Chestnut Hill Tree Farm to ensure a focus on patients and optimal pharmaceutical care. She will assist the company in ensuring access to investigational new drugs and proprietary products for Florida patients through regulatory submissions, including requests for orphan drug designation and IND applications where appropriate, and serve as the primary liaison with the FDA and other regulatory agencies. Dr. Baumgartner also has experience in the medical device industry where she helped develop drug development tools that monitor and improve patient adherence to therapy for use in clinical trials.

Dr. Baumgartner's past experiences in the pharmaceutical field and in the medical device industry provide the company with expert knowledge of drug development, clinical trials, and observational studies done with pharmaceutical products. Her expertise in therapeutic agents will help the company's patients receive the products, care, and education they need. She also brings a deep knowledge of production processes with respect to pharmaceutical manufacturing. Dr. Baumgartner's proficiency will aid the company in providing the safest and most effective products and delivery systems for its patients. Dr. Susan Baumgartner shall apply her knowledge and research of plant science, pharmacology, and medication use to provide the company with strategic direction and oversight of medical product development that is right for public health and individual patient care.

CODI COLEMAN – CULTIVATION DIRECTOR

During his six years in the cannabis industry, Codi Coleman has taken advantage of many different opportunities afforded him that have enabled him to become proficient in cannabis cultivation, quality control, organic methods, and distribution. While managing multiple cannabis cultivation operations, Coleman was tasked with consistently producing high quality plants. Currently, he manages the cultivation facility for a patient cooperative in Colorado. Coleman is highly knowledgeable in many types of nutrient additives and successful methodology applications in compliance to good manufacturing practices. These developed and implemented protocols have resulted in dependably healthy, successful yields. Additionally, Coleman has experience incorporating good manufacturing practices into every cultivation department. During the time when the cannabis industry lacked best practices and good manufacturing procedures, Coleman had the rare opportunity to lead and manage a large cultivation operation while incorporating best practices and compliance into all business practices. He will relocate to take on the role of Cultivation Director with the support of the cultivation consulting team who will set-up the facility, train Coleman and new hires during the first year of operations.

MARGARET GEDDE, MD, PHD - ADVISOR

Dr. Margaret Gedde is a Stanford-trained MD PhD pathologist and award-winning researcher who worked for years developing drugs in the pharmaceutical industry. In 2004, Dr. Gedde left that industry to open an alternative medical practice focused on holistic, supportive, non-pharmaceutical therapies that can offer large benefits to patients but are not accepted by conventional medicine. Currently, Dr. Gedde specializes in the use of cannabis to help patients get healthier and partake in a better quality of life.

Dr. Gedde has significant experience working with virtually all clinical services and therapeutic areas in hospital environments through consultations, nightly calls, examinations, and clinical rounds. As Chief Resident, she led morning resident rounds, organized didactic and journal club series, and was liaison to the administration, facilitating two-way communication between faculty and residents. She worked closely with patients, addressing resident complaints and practiced conflict resolution.

Working to benefit her patients, Dr. Gedde studied techniques by practitioners who used alternative methods including targeted nutritional therapy, therapeutic tissue cleansing, vibrational healing, herbal medicine, and bioidentical hormone therapy. Her clinics ultimately came to focus on the medical use of cannabis for her patients, offering individuals medical cannabis solutions for the treatment of chronic pain, nausea and other conditions.

JILL LAMOUREUX - ADVISOR

As the owner and operator of dispensaries in Colorado from 2008-2012, Lamoureux served and interacted with over five thousand patients, meeting their individual needs and concerns. As a former dispensary and cultivation owner, Lamoureux brings first-hand experience to medicinal cannabis patient's case-by-case plans, education, and curative needs. Additionally, Lamoureux is the Patient-Focused Program Director for Americans for Safe Access (ASA), and has developed the Patients First Certification program for ASA. She has personally experienced the positive quality-of-life impact medical cannabis has on individuals and their families and has been an ardent patient advocate. Due to her first-hand experience with developing a newly regulated system in Colorado, Lamoureux understands the importance of addressing patient, industry, and regulator needs in an effective system.

RICHARD TEMPEL, MD – MEDICAL DIRECTOR

Dr. Richard Tempel completed his residency program at Duke University, a leading research center for epilepsy and cancer patients, where he gained significant experience interacting with patients diagnosed with epilepsy and cancer. Emergency Medicine requires a diverse knowledge of an extremely wide range of illnesses and treatments. Dr. Tempel's expertise in emergency medicine has given him years of hands on and practical experience in dealing firsthand with patients, diagnosing their conditions, and ordering medicines and treatments that are aligned with patient needs. He has wide knowledge of what works, what is practical and how to diagnose this in a short time and communicate this to his patients. Few disciplines have as much patient interaction or cover such a wide array of problems. He understands when situations can be addressed immediately and when a specialist is needed. This broad scope of knowledge gives him unique and valuable perspective in working with patients to help them heal.

Dr. Tempel sees thousands of patients annually in the emergency department. These patients are from many nationalities, and he has experience with patients who suffer from epilepsy, cancer, and muscle spasms. While interacting with the epileptic patients, he interprets their test results, manages their acute seizures, and adjusts their medication dosages, when necessary. When treating his patients with a cancerous condition, he deciphers their test results, manages any acute problems, and often treats the side effects of the chemotherapy.

As an emergency physician, Dr. Tempel has seen hundreds of patients with severe seizure disorders and painful muscle spasms, due to a litany of underlying diseases. He has experience stabilizing their potentially life-threatening conditions, interpreting their test results to provide the best therapy, and ordering medications if needed upon discharge.

DISPENSING PLAN

The company is committed to delivering high-quality, innovative pharmaceutical-grade medicines through a combination of compassionate customer service, efficient clinical experience, and a safe environment. The dispensary design that provides a high level of safety and security in a discrete manner. Using design principles adopted from the healthcare industry, the patient-focused features of each dispensing facility will minimize noise, maximize lighting and ventilation, and deliver comfortable seating.

Patients will enter a comfortable, well-lit, and secure facility. Many patients seeking treatment may be there as a last resort following long-term suffering from chronic or life-threatening illnesses. Treatment plans will focus on open communication, symptom management, ease of access to the facility, and finding the right Derivative Product for each patient.

The company's employees and patients i will benefit significantly from the experience of our advisory team. They bring invaluable knowledge, as it relates to designing and operating a company dedicated to delivering high-quality healthcare services patients. Susan Baumgartner, PharmD, MBA will lead the organization's strategic plan. The company's science and healthcare advisors will shape the direction of its activities including research and product development. The company's business model, its team, and its patient-focused philosophy will make it one of the most respected and reliable Dispensing Organizations in the State of Florida and in the nation.

PATIENT-FOCUSED FACILITY FEATURES

The dispensing facility is designed to make patients feel safe and comfortable. The physical features of the facilities will promote a warm, compassionate and comforting space. The dispensary provides a lobby area to accommodate patient's caregivers and drivers while they wait.t. Patients and escorts will have access to a clean restroom and fresh water.

Upon entering the facility, patients will be greeted by a dispensary employee. The associate will verify the patient or legal representative's credentials before allowing access to the secured patient area. The secured patient area of the dispensing facility will not only feature a clean and well-designed waiting area and service counter similar to a pharmacy, but will also feature multiple private consultation rooms, and multiple point of sale stations for efficient patient throughput.

The dispensing facility building, its parking lot, and its entrances are designed to be in full compliance with the Americans with Disability Act (ADA) and all zoning and building ordinances. The facility restrooms will fully comply with all ADA requirements for convenient wheelchair access. Furnishing in the private transaction rooms will also accommodate wheelchair access (e.g., lower counters).

SALES AND DISTRIBUTION

The company's sales and distribution policies, detailed below, describe how to ensure that no unlawful sales transactions are permitted or tolerated by the dispensing facility. Provisions have been established to ensure the dispensing facility will not display more than one sample of each product offered for sale and that products are displayed in accordance with best practice. Required identification verification measures are addressed in company policies and procedures, and prohibited transactions are comprehensively described. Additional measures address delivery sales, preparation of taxes, and sales accounting. The Dispensary Manager is assigned oversight responsibilities for ensuring the accuracy and maintenance of all sales records.

DAILY DISTRIBUTION PROCESSES

At the start of each business day, employees will arrive at the facility and check in with the supervisor on duty. Each employee will clock in for his/her scheduled shift and proceed with normal business operations. Employees will be assigned open and closing responsibilities, as well as specific tasks and other business-critical processes, to be completed during each shift.

OPENING RESPONSIBILITIES

The daily responsibilities for preparing the facility to open each day will consist of the following:

- Balancing and assigning cash drawer to each point of sale system terminal.
- Inventory management.
    1. Recording beginning daily inventory on log sheets and in BiotrackTHC..
    2. Manager verification that inventory is correct.
    3. Assessment of inventory levels relative to forecasted sales.
- Ensuring there are sufficient amounts of Derivative Products available for sale during the shift and the next day.

CLOSING RESPONSIBILITIES

The daily responsibilities for closing the facility and securing product for safe storage through the night will consist of the following:

- Closing and balancing the point of sale system.
- Balancing and reconciling cash.
- Managing inventory:
    1. Recording ending daily inventory on log sheets and in the BioTrackTHC.
    2. Manager verification that inventory quantities are correct
- Reconciling inventory—if there is a discrepancy, management will determine how to proceed and report.
- Securing the facility for nightly closure.
- Preparation for next business day, including product availability relative to patient demand.

SALES AND PATIENT MANAGEMENT

The Dispensary Manager is responsible for all sale transactions in the dispensing facility. The Dispensary Manager must ensure all employees working in the dispensing facility are properly trained on all operating procedures. OCU-specific procedures must be developed, written in detail, and maintained by the Dispensary Manager. The dispensing facilities will not be open or in operation unless either the Medical Director or Dispensary Manager and one employee are on the premises and directly supervising the activity within the facility. At all other times, the dispensing facility will be closed and properly secured.

PATIENT INTAKE

All new patients will complete a new patient intake process and be offered an orientation to the facility.. All forms will be completed and signed on electronic tablets. A printed copy of signed forms will be provided to the patient. All qualified patients and designated legal representatives will be documented in BioTrackTHC to ensure compliance with patient management, inventory, and tracking policies.

PATIENT IDENTIFICATION CARDS

No employee will complete a sales transaction for a patient or the patient's designated legal representative if his/her information is not current and verified in the registry.

IDENTIFICATION REQUIRED
Immediately upon entry to the premise, all patients and legal representatives must present to the Patient Associate valid proof of identification. The patient must be registered in the compassionate use registry for authorization to receive a dispensed medical cannabis product, and the patient or designated legal representative must be verified by an appropriate staff member of the dispensing facility. Acceptable IDs are limited to:

- A driver's license;
- A government-issued identification card;
- A military identification card; or
- A passport.

PATIENTS UNDER 18 YEARS OLD
A person under the age of eighteen (18) must be precluded from purchasing Derivative Products unless he or she is a qualified patient and is accompanied by their designated legal representative.

PROHIBITED TRANSACTIONS
The company employees may not:

- Open or operate the dispensing facility without approval from the OCU. The Medical Director or Dispensary Manager will be on the premises and directly supervising activity within the facility. At all other times, the dispensing facility will be closed and properly secured.
- Permit any other third party to sell any items on site.
- Allow approved Derivative Products to be vaporized or consumed on the premises of a dispensing facility.
- Dispense approved Derivative Products to anyone other than a certified patient or designated legal representative.
- Dispense an amount greater than a 30-day supply to a certified patient or designated legal representative, and not until the patient has exhausted all but a seven-day supply provided pursuant to any previously dispensed Derivative Product by any registered organization. The company will verify this information by consulting the registry.
- Open Derivative Product packaging.
- Allow anyone in the secured dispensing area who is not expressly authorized to be in the dispensing area.

NO UNLAWFUL TRANSACTIONS
In accordance with state laws and regulations, the company will ensure that no unlawful sales transactions are permitted or tolerated. No sales or distribution of Derivative Products to non-registered patients or legal representatives may ever occur.

NO SUSPECTED DIVERSION ALLOWED
Employees must refuse to sell Derivative Products to a patient or legal representative they suspect may be diverting such products and notify the Security Director immediately.

REFUSAL OF SALE
Any employee may refuse to dispense products to a patient or his/her authorized legal representative if, in the opinion of the employee, the patient or the public would be placed at risk. In any instance of denial, the Dispensary Manager will notify the patient's physician within two (2) business days.

COMPLETING THE SALE

After verifying the certified patient's information and their physician certification, the employee will check BioTrackTHC and the OCU registry to determine the quantity of Derivative Products the patient is allowed to purchase.

PRICING

The company will provide its Derivate Products at the lowest possible cost to patients while observing its fiduciary responsibilities. Prices will be easily available and transparent to patients and will not change without reasonable notice. The company will maintain a detailed accounting of all costs that were included to arrive at its proposed price, including but not limited to its fixed and variable costs such as materials and services; direct labor; and indirect costs.

Part 3.C.1.b. Experience with handling confidential information

SUSAN BAUMGARTNER, PHARM.D., MBA – CHIEF OPERATING OFFICER

Dr. Susan Baumgartner has completed HIPAA training, and has substantial experience handling confidential information. In almost every aspect of Dr. Baumgartner's professional career, she has had to maintain confidential information pursuant to all state and national laws and regulations. In the past, Dr. Baumgartner has managed regulatory submissions to the FDA, negotiated collaborative development deals, and established strategic alliances and agreements with pharmaceutical companies, CDMO's, and other strategic partners. She has completed a national standard training for HIPAA compliance, earning a certification focused on ensuring the privacy and security of patient information. Furthermore, Dr. Baumgartner has significant experience designing and implementing successful and compliant training programs for employees, including: managers, individual contributors, and cross-functional teams. Her experience gathering and managing confidential information, including prescription drug utilization data, clinical trial data, and patient records will assist the company's efforts to provide pharmaceutical grade products while being fully compliant with all laws and regulations.

BRADY BLAKE - CONSULTANT

As an experienced and accomplished cannabis cultivator and dispensary operator in the State of Colorado, Brady Blake has been held responsible for ensuring each registry database of the company is password protected and encrypted.

CODI COLEMAN - ADVISOR

Codi Coleman has protected the confidentiality of patients in compliance to the procedures used by the Medical Marijuana Registry in the State of Colorado. Coleman has established a secure environment for all of his company's patients' confidentially for six years.

MARGARET GEDDE, PHD - ADVISOR

As a Post-Doctorate Fellow, Chief Medical Resident, Clinical Instructor, and General Practitioner since 1996, Dr. Margaret Gedde has extensive experience working daily to help her patients while protecting their confidential rights pursuant to state laws and regulations, and mandating HIPAA standards.

JILL LAMOUREUX - ADVISOR

As a former dispensary owner and operator, Jill Lamoureux brings five years of experience handling confidential information for thousands of patients. Lamoureux has successfully managed all confidential documents without any adverse incidents pursuant to Colorado's Record Protection Laws, mandated by HIPAA regulations and the Privacy Rule.

DR RICH TEMPEL – MEDICAL DIRECTOR

Dr. Tempel deals with handling confidential information every day in his career. This is a common practice in Emergency Room protocol.

The company is focused on education and outreach rather than traditional marketing. By virtue of the limited number of dispensing organizations, the company will not advertise in the traditional manner of placing advertisements and commercials. The company will create a detailed and educational website in addition to the appropriate and responsible use of social media. Education and educational services for patients and physicians and community outreach will comprise the primary marketing activities of the company.

PATIENT EDUCATION AND SUPPORT SERVICES

The company's mission is to create and maintain a patient focused operation, produce high-quality products through proven best practices, and empower patients to appropriately use these products and engage in informed conversations around their experiences with Derivative Products. A key component of this mission is the company's patient education and community outreach plans.

The company will provide accurate and accessible patient and physician education programs, as well as other supporting services. By covering safety standards, understanding the effects of Derivative Products, and discussing the potential benefits and adverse effects of each dosing method, the company will inform patients and physicians in making decisions about what products will meet patients' needs and the optimum medical cannabis therapy plan.

The company will focus on continual improvements for condition-specific treatment plans as additional evidence-based information is available from patient feedback and the latest scientific research. The company will utilize patient feedback to help explore improvements in patient and physician education and support services.

EDUCATIONAL APPROACH

The company is fully committed to using patient and physician education as a means of disease management and providing access to the latest information regarding targeted diseases and treatment options. Educational programs will be offered for important topics such as treatment for individual conditions, diet, exercise, and stress relief. This will provide patients with a more complete understanding of whole health and the individual triggers that can affect a person's condition and symptoms.

The company will employ a variety of educational techniques to raise awareness, ensure understanding, and support patients, legal representatives, and the community at-large. Education begins with the company's engaging, user-friendly website featuring product information designed to help raise patient awareness and understanding of safe and ethical use. Chestnut Hill Tree Farm will distribute products under the Novia Medical brand name.

The company's healthcare advisor, Thomas McGinity, brings over 25 years of healthcare communications experience to the team. He will assist Chestnut Hill Tree Farm in creating educational programs for the Novia Derivative Products line. The program will be implemented as soon as feasible and will feature Medical Science Liaisons in the field and the company's team of scientific advisors to communicate scientific and clinical information to patients, physicians, and other stakeholders. This program is distinct from a sales force and has no sales responsibility or product use incentives. Their focus is on medical education. The education program will be developed to be in alignment with the state's priorities and their specified key knowledge areas for prescribers and will incorporate the latest research findings in the field of cannabinoid research and with the company's own findings based on patient feedback. McGinity will ensure the company's medical education efforts for physicians aligns with physician education in statutes - "encompasses the clinical indications for the appropriate use of low-THC cannabis, the appropriate delivery mechanisms, the contraindications for such use, as well as the relevant state and federal laws governing the ordering, dispensing, and possessing of this substance.

Novia Medical

Home - About Us - Services - Contact Us

Medical Cannabis is a Revolutionary Treatment with Success in Treating Epilepsy, Cancer Pain and Muscle Spasms (MS, ALS, Parkinsons Disease). Novia Medical Provides The First True Medical Delivery Systems For The Treatment of These Conditions.

OUR MISSION

The current medical cannabis products have inconsistent and unpredictable quality. Our mission is to provide true medical solutions for those suffering from these diverse conditions.

OUR PRODUCTS

Our products will be tested to the highest quality standards to ensure safety and to optimize patient outcomes. Our products will be a true medical solution for those suffering from a diverse range of medical conditions.

OUR RESEARCH

We will partner with global leaders in the development, delivery, and manufacturing of medications and consumer health products as well as leading academic research institutions including UF, to develop the first true predictable, time-released delivery systems for medical cannabis.

OUR TEAM

Our team includes experienced professionals and internationally recognized medical researchers. We are using the best cultivars of cannabis to produce our products, and will be testing these in clinical trials.

OUR FACILITIES

We produce our products in state-of-the-art greenhouses and pharmaceutical production facilities at Progress Research Park in Alachua, FL.

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Educational sessions and seminars on important health-related topics moderated and led by established experts will be offered at the dispensary and via webinars. Additionally, disease-specific educational offerings and one-on-one sessions with Patient Associates will offer customized, patient-specific education. The dispensary will also have

written and electronic patient resources that can be transmitted or provided to patients, as well as a patient library providing access to information on medical cannabis, healthy lifestyles, and other relevant health-related issues.

All patients will have the opportunity to opt-in to receive periodic emails, texts, or phone calls with various updates about the medical cannabis program, scheduled events and seminars, and other information concerning the use of Derivative Products. Patients will provide written authorization for staff to contact them and provide this information.

PATIENT FEEDBACK SYSTEM

As a patient-focused organization, the company recognizes the importance of working closely with patients to manage the efficacy, safety, and quality of Derivative Products, to engage patients in their healthcare, and to enhance the patient experience. A key component is providing patients and legal representatives with an easy process for reporting experiences and providing feedback on the company's products and services. The company plans to utilize BioTrackTHC's feedback module in addition to developing a secure, web-based, mobile patient feedback application, as well as feedback kiosks in every dispensary. Patients will be able to provide feedback about their experience with medical cannabis products, dosages, overall treatment experience, changes in symptoms and responses to medications, and/or adverse events through these mechanisms.

Optional atient feedback will provide the company with an understanding of products and services from the patient's perspective. It will enable the company to refine products based on patient needs and develop new educational modules, customized services, and improved procedures. In general, this feedback will be used to enhance all areas of the patient experience and improve patient outcomes. The Patient Associates will also solicit and record patient feedback when appropriate, especially following initiation of therapy with a new product and during the first few patient visits.

The private and secure web solution will be accessible to all qualified patients via their Web browser via a personal computer, tablet, or mobile phone with responsive design to encourage patient adoption. Access will also be available within the dispensing facility and will include options for patients without internet access, including written optional surveys and interactions with staff to collect patient response information. The solution will also be scalable to meet the future needs of the organization.

The solution will be both event-driven and research enabled:

- Event-Driven Feedback: Patient feedback will be requested in real-time during patient interactions at the dispensing facility.
- Research-Enabled Feedback: Data will be analyzed to evaluate efficacy, safety, quality, and utilization and to inform product development as well as the optimization of product formulations and delivery systems to enable the best health outcomes in the management of targeted diseases.

RESEARCH GRANTS

Chestnut Hill Tree Farm's business model is based on research and development. Internal research plans focus on condition-based Derivative Product develop. However, the company understands that the entire field of cannabinoid research is critical to the company's mission. As a result, the company has made a commitment to donate 2.5% of gross proceeds in perpetuity to research projects, with research conducted at the University of Florida being the priority grantee. The grant program will be implemented once the company has recouped its initial capital investment and is operating profitably. The science advisory team will meet to allocate grants annually and will determine recipients with following conditions as a guide to decision making:

- Cannabinoid research at the University of Florida (first priority).
- Research that shows promise to immediately impact the lives of patients.

- Research that will assist Novia product development.

PATIENT FINANCIAL ASSISTANCE PROGRAM

The company is committed to treating all patients with compassion, respect, and dignity regardless of socioeconomic or mental health status. According to the World Health Organization, chronic diseases and poverty are interconnected in a vicious cycle. Chronic disease is concentrated among those with low incomes. They are more vulnerable due to: material deprivation, psychosocial stresses, higher risk community behaviors, unhealthy living conditions, and limited access to healthcare. Additionally, chronic diseases can create a significant financial burden on individuals (especially women) and families, and accelerate a downward financial spiral of worsening disease and poverty[1].

Although effective and safe, Derivative Products can be an expensive treatment option for patients. Medical Derivative Products are not allowed as a deductible healthcare expense for federal income tax purposes, nor are they covered by medical insurance. The company recognizes the burden this can place on some patients and is committed to assisting those who would experience a financial hardship if they became certified patients. We are committed to providing affordable and safe access to quality Derivative Products for all eligible patients.

The company's financial assistance program is a sliding scale program that will provide support to the greatest number of patients possible based on income. Proof of assistance from another need-based support program will serve as sufficient evidence for enrollment in the financial assistance program. This procedure does not require our staff to possess, review, or make judgments about a patient's private financial information. Should the patient submit financial data for consideration, the company will not retain copies of personal information.

The program will provide assistance vouchers for purchases to patients who are deemed to be eligible for the Patient Financial Assistance Program. Assistance vouchers allow patients access to all forms of Derivative Product and will not limit them to a restricted selection of discounted product. The value of a monthly assistance voucher will ensure access to all Derivative Products. It will be awarded to participating patients based on income level and patient needs according to thirty-day supply limits determined by the recommending physician. BioTrackTHC will be utilized to track the program, including assistance voucher amounts and voucher expiration dates. The program budget and number of patients awarded access to the program will grow as the company grows. The company's financial assistance program aims to assist as many patients as possible while maintaining sufficient assets to achieve financial stability and provide for growth. Additionally, funding for the program must be balanced with other community support initiatives.

FINANCIAL ASSISTANCE PROGRAM MANAGEMENT

Program Oversight

- The Dispensary Manager must authorize the Financial Assistance budget annually.
- The Chief Operating Officer will authorize any operational program changes.
- The Financial Assistance Program is overseen by the Outreach Manager.
- The Outreach Manager will develop program documents and procedures to be approved by the Medical Director.
- The Patient Associate implements the Financial Assistance Program at the dispensary.

[1] http://www.who.int/chp/chronic_disease_report/part2_ch2/en/

Eligibility

- Financial assistance may be granted to patients who are properly registered with the OCU. Participation is based on the patient's income, not that of their legal representative.
- A patient must provide proof of receipt of assistance from an approved need-based financial assistance program or provide certified copies of their federal or state tax returns in order to qualify for assistance.
- The Dispensary Manager will grant final approval on any hardship application received at the dispensary.
- The Dispensary Manager will have the authority to grant financial assistance with the Outreach Manager's approval to a patient for reasons other than financial hardship including, but not limited to:
    1. Active duty or veteran status;
    2. Hospice status;
    3. Disability status; or
    4. SSI or SSSD

Acceptable Proof of Need

- A patient may provide an award letter (issued within the previous 12 months) from any of the programs listed below as proof of eligibility.
- Additionally, a patient may submit a certified copy of a federal or state income tax return for verification.
- Patients receiving the following aid or with certified tax return adjusted gross income between 201% and 300% of federal household poverty guidelines will qualify for the standard voucher level:
    1. Unemployment benefits (must be current – within one month)
    2. Workers compensation benefits (must be current – within one month)
    3. WIC, SNAP or LIHEAP
    4. Medicaid
- Patients with income between 100% and 200% of federal household poverty guidelines will qualify for the plus voucher level.
- Patients receiving the Earned Income Tax Credit or with income under federal poverty guidelines will qualify for the maximum voucher level.

ASSISTANCE AWARD VOUCHERS

- During initial operations, the company will issue assistance vouchers equivalent to a percentage of projected annual gross income to be determined once operational.
- Once the company has recouped expenses from the initial capital outlays or begins to cover debt service obligations, the voucher program will be increased to a higher percentage of the previous year's gross income.
- The Medical Director may adjust these levels based on the desired mix of community and patient support and community giving.
- If a patient has need beyond the maximum award level, the Outreach Manager may approve a higher assistance voucher award at their discretion.

PROGRAM TERMS

- The Dispensary Manager at each dispensing facility will approve or deny all applicants to the financial assistance program.
- The Dispensary Manager may award assistance voucher status to patients temporarily due to unemployment or injury as approved by the Outreach Manager.
- Additionally, with Outreach Manager approval, the Dispensary Manager may award assistance voucher status to veterans, senior citizens, and other patients on a case-by-case basis.

- The Dispensary Manager will maintain a waiting list of applicants to select new participants when program slots become available.
- Vouchers may be used for Derivative Products and/or delivery equipment (i.e. a vaporizer).
- Patients must provide new assistance award letters upon the one-year anniversary of the award or provide tax returns every twelve months to maintain status in the program.
- Patients receiving assistance vouchers based on unemployment or a worker's compensation injury must provide documentation of eligibility monthly.

RECORDKEEPING

- The Outreach Manager will remove any patient suspected of diversion from the program immediately.
- The dispensary will not retain any patient documentation used to verify financial status.
- All financial documentation submitted for review will be scanned and returned immediately to the patient upon verification.

Patient Hotline

The company will seek to partner with SafetyCall International PLLC to assist in the implementation of standard of care, post-market surveillance services associated with the sale, distribution, and use of Derivative Products manufactured by the company. The centralized call service will answer any questions patients may have about Derivative Products and will document any patient experiences that are communicated to their call representatives. Relevant information will be transferred to staff and/or the ordering physician in a timely manner. This information will also be documented in the BioTrack system.

Complementary Lifestyle Services

The company views providing Derivative Products as only one aspect of an integrated approach to healthcare and lifestyle management. In following this approach, the company will seek to develop partnerships with local providers to offer its patients various complementary health-related services at a discounted rate, including:

- Acupuncture Treatments
- Massage Therapy
- Meditation
- Yoga
- Nutritional Consultation
- Other potentially helpful treatment methods

PATIENT COUNSELING

The company will offer to provide counseling each time Derivative Products are dispensed to a certified patient or designated legal representative. If a certified patient or designated legal representative requests to be counseled, such counseling will be provided in a confidential manner and will include, but is not limited to, the following:

- Description of the formulation of Derivative Product and known indications;
- Dosage form, dosage, route of administration, and anticipated duration of effects of the product;
- Special directions and precautions for preparation, administration, and use of the therapeutic agent by the patient;
- Expectations related to what the patient may experience when taking the product;
- Common side effects or adverse effects or interactions and therapeutic contraindications that may be encountered, including how to avoid them, and actions required if they occur;

- Instruction in techniques for self-monitoring;
- Instruction for proper and secure product storage;
- Refill information; and/or
- Action to be taken in the event of a missed dose.
- No employee will counsel the certified patient or designated legal representative on the use, administration of, and the risks associated with approved Derivative Products, unless a supervisor is available onsite.

SUBSTANCE ABUSE AND PREVENTION

The company will be proactive in recognizing and preventing substance abuse. Brochures and educational information on prevention and treatment of substance abuse, including a list of local providers, will be readily available and displayed prominently. In the event that a potential substance abuse problem is identified, based on data collected or employee observation, the patient will be notified and provided with a list of local providers for patient assistance, drug and alcohol treatment, and family services that patients may access without the company's involvement. All dispensary employees will be thoroughly trained on identifying substance abuse problems.

The company will assure that our patients receive appropriate services and products to assist them in achieving their optimum level of health. Because patients who come to the dispensary with conditions that cause them distress may demonstrate an increased likelihood of problems associated with the use of alcohol or other drugs, it is important to identify those with addiction disorders quickly, and refer them for assessment and associated care if needed.

The Patient Associate will refer patients who have been identified as needing assistance or have requested assistance to a licensed counselor for assessment interview, recommendations, development of a treatment plan, if necessary, and coordination of admission to an outpatient or inpatient program. The Patient Associate and Dispensary Manager will maintain an up-to-date understanding of community resources (and contact information) that are available to support patients in need. In addition, dispensary employees will be equipped to educate patients, parents, and legal representatives on how to identify signs of substance abuse and how to deal with substance abuse. The company will also have readily accessible information and educational materials available relating to youth substance abuse prevention.

COMMUNITY OUTREACH

The company is committed to being an active, responsible member of the community by donating resources and providing its patients and the community it serves with accountable, transparent, and professional support services. It plans to be a collaborative partner in supporting the needs of the community by building relationships with the community's municipal, business, law enforcement, healthcare, and non-profit professionals.

The company will continue to reach out to local community organizations and other stakeholders to assess the community's attitude regarding its operations in the community. It has initiated the process of communicating with local leaders and businesses to assure public opinion is favorable of the operation and to alleviate any concerns. The company has also established an active line of communication with local law enforcement leaders. It is committed to maintaining a close working relationship with local law enforcement to enhance its security and to provide a secure and positive experience for its employees, patients, legal representatives, and the community.

Management and staff will be encouraged to contribute to and get involved in local community programs and organizations. Additionally, the Outreach Manager's duties include actively seeking out local organizations with

whom the company can create partnerships. The company employees will be encouraged to donate their time to organizations in which they are personally interested and to organizations with which the company has created partnerships.

The company will also directly support the communities where its facilities are located by providing high-paying jobs and training for the unemployed and underemployed, preferentially seeking out veterans and local residents.

A major component of the company's community outreach plan will be annual monetary contributions to local communities and organizations to advance the public perception and appropriate use of medical cannabis. Like the patient population and the communities where they live, the areas that could benefit from the company's outreach program are broad and diverse. The Outreach Manager will work with the Medical Advisory Board to determine how to disperse funds appropriately with priority given to those locations where the company's facilities exist. The disbursement plan will be managed by the Chief Executive Officer.

The company intends to give preference to medical cannabis educational efforts, medical cannabis research, health-related veterans services, and community health. The company recognizes the benefits of collaboration. It believes it would be beneficial to all communities involved if the five selected registered organizations work together to support the programs and areas outlined. The company's primary objective is improving the lives of the patients and their communities. The organization is committed to delivering scientifically proven, pharmaceutical-grade, medical cannabis therapies to qualified patients with serious medical conditions throughout Florida.

Part 3.C.2.d. Experience gathering and managing data, i.e. data on patient reactions to products dispensed

BIOTRACKTHC

In order to ensure full transparency and compliance to state laws and regulations, the company will integrate BioTrackTHC technology into its business model. BioTrackTHC provides a turnkey medical cannabis point-of-sale system that shall meet all Florida State regulations while allowing for easy grow operations tracking, inventory, patient management, accounting, and reporting covering all operations and patient reporting.

SUSAN BAUMGARTNER, PHARM,D., MBA – CHIEF OPERATING OFFICER

Dr. Susan Baumgartner has substantial experience gathering and managing data, including collection of information regarding patient responses to therapeutic interventions, prescription drug utilization data, clinical trial data, adverse event data and the formal reporting of adverse events, and research summaries. Her previous knowledge and successful management of important data will assist the company's efforts to provide pharmaceutical grade Derivative Products. Her training as a pharmacist throughout the Doctor of Pharmacy program at the University of Florida and professional experience with Merck included significant training on interacting with patients and gathering and managing medication use data and information on patient experiences. She will help the company manage all aspects of patient experience, including: documentation of patient needs, relevant market research, analyses of utilization and outcomes data, adverse event reporting, patient-focused product development, and patient satisfaction. Additionally, Dr. Baumgartner shall maintain full accountability for dispensing of company products to the appropriate patients, and ensure accurate tracking and reporting of dispensed products.

BRADY BLAKE - CONSULTANT

Brady Blake brings over five years of experience working with medicinal cannabis patients, maintaining their records, and gathering data to further recommend treatment. Brady has extensive knowledge of the cannabis plant and its medicinal properties. He has personally worked with and grown over one hundred strains of cannabis, studying their small difference and benefits in relief of ailments. He keeps up to date with the scientific studies and has seen in person the life altering, powerful healing ability that cannabis oils possess. His past experience with soft skills training and his naturally compassionate attitude help him articulate the effects of the medicine on current and future patients while gathering and managing their case-by-case data.

CODI COLEMAN – CULTIVATION DIRECTOR

Codi Coleman has significant experience personally working with patients' records of specific conditions and complaints. He brings six years of providing case-by-case recommendations for beneficial Derivative Products for specific conditions. He believes that it is extremely important to be fully aware of what you are dispensing to your patients in order for company employees to educate patients on what is the appropriate digestive use for them.

MARGARET GEDDE, MD, PHD - ADVISOR

To provide her patients with treatment of chronic pain, nausea and other conditions, Dr. Margaret Gedde has substantial experience gathering and managing data regarding patients' conditions and reactions to products dispensed. Trained in all areas of the clinical laboratory (including molecular diagnostics, hematology, immunology, coagulation, transfusion medicine, microbiology and chemistry), with emphasis of diagnosis and therapy of

leukemia and lymphoma, Dr. Gedde has been responsible for creating detailed timeline documentations of patients' health conditions and reactions to pharmacology products. Currently, working with patients in the cannabis industry, she maintains documentation of individual reactions to medicinal cannabis therapy, aiding in relieving their pain, improving their health, and helping them to reclaim their lives.

JILL LAMOUREUX - ADVISOR

Since her career emerged in the cannabis industry in 2008, Jill Lamoureux has provided patients with superior education and leadership in regards to individual medical conditions, responses to treatment, and concerns. Lamoureux has established reporting and recall procedures and protocols in the United States and Canada through her work with AHPA as an international consultant to multiple operators.

DR. RICHARD TEMPEL – MEDICAL DIRECTOR

As an emergence physician, Dr. Tempel has worked in many hospital emergency rooms, serving patients with critical conditions. His job has been to stabilize patients for referral to the appropriate department for further evaluation. Dr. Tempel has experience with treating conditions that span all areas of medicine. Dr. Tempel has treated many patients who have life-threatening conditions on a regular basis. He has had to evaluate a wide variety of ailments, sometimes with little to no information. For this reason, Dr. Tempel is able to think and act quickly, to make a tentative diagnosis, and determine the appropriate course of treatment for his patients. As the Medical Director for the company, Dr. Richard Tempel brings significant experience in best practices and patient care

SUSAN BAUMGARTNER, PHARM.D., MBA – CHIEF OPERATING OFFICER

Dr. Baumgartner, the Chief Operating Officer, has managed adverse event reporting and recalls related to pharmaceutical products in compliance with FDA reporting requirements. Her experience in quality assurance and regulatory compliance will help the company manage product risk and reduce product liability. Susan managed teams of Business Managers and Sales Representatives during her career at Merck and was responsible for training them on adverse event reporting and product quality issues. Her experience designing and implementing successful and compliant training programs for employees, including managers, individual contributors, and cross-functional teams will assist the company in training employees to report key patient information and execute product recalls successfully.

She has professional training as a pharmacist, with extensive knowledge of patient responses to a broad range of medications and interacting with patients throughout the medication use process.

JILL LAMOUREUX - ADVISOR

Jill Lamoureux has established multiple reporting and recall plans in both the United States and Canada through her work with AHPA and as cannabis consultant to operators.

RICHARD TEMPEL, MD – MEDICAL DIRECTOR

Dr. Tempel brings extensive research experience to the company. A significant portion of his research as an undergraduate, medical student, and physician at Duke University's Medical Center has included clinical trials and observational studies. During this time, Dr. Tempel has grown accustomed to handling recall procedures with medicinal products.

Part 3.C.2.f. Knowledge of cannabis routes of administration

SUSAN BAUMGARTNER, PHARM.D., MBA – CHIEF OPERATING OFFICER

Dr. Baumgartner's depth of knowledge with respect to cannabis and routes of administration will ensure effective and successful patient experiences with the company's medicinal products. She brings years of experience in pharmacy and the pharmaceutical industry, aiding patients in getting the most out of their medication. She has expertise in pharmacology and understands the intersection of pharmaceutical sciences and patient factors that enable the best therapeutic outcomes. Her experience designing and implementing successful and compliant training programs for employees will assist the company in selecting and managing a skilled and professional workforce. Susan Baumgartner shall apply her knowledge and research of medicinal products and pharmacology to provide the company with strategic direction and oversight of medical product development for various routes of administration, delivery strategies, and formulation approaches. In addition, Dr. Baumgartner shall actively collaborate with research institutions, key researchers, and thought leaders to support and advance research on the safety and efficacy of low-THC cannabis and Chestnut Hill Tree Farm products.

CITIVA MEDICAL – LICENSING PARTNER

Chestnut Hill Tree Farm has engaged in a letter of intent for a mutual licensing agreement with Citiva Medical. Citiva is a cannabis science company engaged in product development. Citiva Medical has a wide range of products that vary according to specific illness categories. They have garnered specific cannabinoid ratios from clinical and observational studies as well as physician and patient reported outcomes in order to create unique cannabinoid-based treatments and products. Citiva Medical is on the cutting edge of cannabinoid technology through its use and collection of proprietary genetic strains, collection of data, and knowledge of phyto-cannabinoids as they relate to the human endocannabinoid system. Citiva Medical is fast at work to create products aimed at a variety of illnesses and disease states by utilizing specific cannabinoid ratios. The company will both benefit from and contribute to this work.

MARGARET GEDDE, PHD - ADVISOR

Margaret Gedde, M.D., Ph.D., is a Stanford-trained pathologist and award-winning researcher who founded Gedde Whole Health in 2004 and continues to lead this holistic, integrative medicine practice in both Colorado Springs and Buena Vista, CO. She is the founder of the Clinicians' Institute for Cannabis Medicine and the Medical Director of Vibrant Health Clinic.

Dr. Gedde specializes in the use of cannabis as a plant-based therapy that helps patients manage chronic pain, relieve nausea, and better manage their lifestyle while navigating multiple chronic health conditions. Dr. Gedde has experience in using cannabidiol (CBD) as a treatment for multiple indications, including the management of pediatric epilepsy. She presented her work ("Whole Cannabis Extract of High Concentration Cannabidol May Calm Seizures in Highly Refractory Pediatric Epilepsies") before the American Epilepsy Society in 201Part 3. She has been published in 11 peer-reviewed journals.

JAHAN MARCU, PHD – QUALITY ASSURANCE OFFICER

Jahan Marcu and his team of scientists at Green Standard Diagnostics shall assist the company in developing products with differing routes of administration. Jahan Marcu, PhD, is a cannabinoid research scientist, who has contributed to groundbreaking research in the plant science and medicinal cannabinoid field including cannabinoid receptor science. Dr. Marcu brings strategic focus, vision, and mature judgment gained during a successful career guiding the creation of operational protocols while implementing scientific research and advisory services that generate sustained, consistent, positive results to the cannabis industry. He uses innovation and research to educate the world, devise medications, and develop fundamental business practices that change patients' lives. Dr.

Marcu is currently the Director of Research and Development at Green Standard Diagnostics Inc., the Senior Scientist at Americans for Safe Access, and on the Board of Directors of the International Association for Cannabinoids as Medicine. Jahan Marcu is also a founder of the Patient Focused Certification program. He received his PhD for significant contributions to the study of the structure and function of the CB1 receptor, and the role of the endocannabinoid system in bone.

RICHARD TEMPEL, MD – MEDICAL DIRECTOR

While completing the FMA-approved low-THC Cannabis course, Dr. Richard Tempel received significant education regarding the different routes of cannabis administration. He will expand his knowledge and understanding by attending as many training programs and seminars as possible. This will also help in his oversight of education and outreach programs.

Part 3.C.2.g. Training programs for employees addressing: i. The Health Insurance Portability and Accountability Act (HIPAA); ii. Patient education; iii. Compliance; iv. Patient counseling; and v. Data collection.

BIOTRACKTHC

BioTrackTHC is a secured program that is password protected and also can be set for Biometric Fingerprint scanning to ensure only authorized personnel will be able to access secure documentation within the system. All the information is stored on a local server that is firewall protected from any outside presence.

Our intentions are to continue to evolve and grow with the Florida Department of Health (DOH) while continuing to lead the industry. The required data collection points will produce actionable intelligence creating the first real time patient management platform for the cannabis industry. BioTrackTHC is fully HIPAA compliant and has undergone strict SAS 70 DEA certification. Our commitment to excellence, transparency, and accountability are part of our core fundamental infrastructure.

The company will implement web-enabled input from patients (available via mobile platform on tablet or mobile phone) accessible in real time by the ordering physician and easily integrated into EHR to facilitate physician documentation and requirements for UF patient evaluation of medical cannabis outcomes.

EMPLOYEE TRAINING PLAN

Training is a critical component of the dispensary's operations. The Medical Director and Dispensary Manager are responsible for the development and execution of training for the dispensing facilities' employees.

TRAINING REQUIRED

The Medical Director has completed and the Dispensary Manager will complete the 8-hour course and subsequent examination offered by the Florida Medical Association or the Florida Osteopathic Medical Association that encompasses the clinical indications for the appropriate use of low-THC cannabis, the appropriate delivery mechanisms, the contraindications for such use, as well as the relevant state and federal laws governing the ordering, dispensing, and possessing of this substance before beginning work.

The Dispensary Manager, in coordination with the Medical Director, must develop training for all dispensing facility employees that, at a minimum:

Employees must be trained before beginning work. The Human Resources Managerwill ensure the new employee has received appropriate training commensurate with his/her job responsibilities and that the employee is ready to perform the job tasks assigned to him/her. Training must be tailored to the roles and responsibilities of the job function of each employee, and at a minimum must include training on confidentiality, and other topics as appropriate for the position. At a minimum, employees must receive eight hours of on-going training annually. Training must cover at a minimum:

- Local, state, and federal cannabis laws;
- Medical Derivative Product efficacy and recent research;
- Patient confidentiality, education, and care;
- Personnel, product, and premise security; and
- Record keeping and regulatory responsibilities.

TRAINING MATRIX				General Manager/Asst GM	Controller/Bookeeper	Inventory Manager	Admin Assistants (All Units)	Dispensary Manager/Asst Mgr	Patient Coordinator	Dispensary Agent	Cultivation Manager/Asst Mgr	Processing Manager	Gardener	Trimmer	Production Manager/Asst Mgr	Extraction Manager/Asst Mgr	Infused Products Manager/Asst Mgr	Packaging Manager/Asst Mgr	Operations Manager	Quality Control Agents	Security Manager	Maintenance Manager	Transportation Manager
Training Module	**Hrs.**	**No.**	**Trainer**	**ADMINISTRATIVE**				**DISPENSARY**			**CULTIVATION**				**PRODUCTION**				**OPERATIONS**				
Train the Trainer	16.0	1/yr	3rd Party	x		x		x			x				x					x			
*New Employee Orientation	8.0	1x	Unit Mgr		x	x	x	x	x	x	x	x	x	x	x	x	x	x	x	x	x	x	x
Medical Cannabis Science	4.0	1/yr	3rd Party					x	x	x	x		x		x	x	x			x			x
*Production Safety	2.0	2/yr	Production Mgr													x	x	x	x				
Patient Relations	2.0	2/yr	Dispensary Mgr				x		x	x										x			x
Monthly Unit Meetings	2.0	12/yr	Unit Mgr		x	x	x		x	x		x	x		x	x	x	x	x		x	x	x
Medical Cannabis Science Update	2.0	1/yr	3rd Party					x	x	x	x				x	x	x			x			x
Compliance, Regulation, and Law	2.0	1/yr	GM		x	x	x	x	x	x	x	x	x	x	x	x	x	x	x	x	x	x	x
Transportation	1.5	1/yr	GM			x		x	x	x	x								x		x		x
*Cultivation Safety	1.0	2/yr	Cultivation Mgr								x	x	x	x				x	x				
*Cultivation Security	1.0	2/yr	Cultivation Mgr			x					x	x	x	x				x	x		x		
*Dispensary Security	1.0	2/yr	Dispensary Mgr			x		x	x	x									x		x		
*Confidentiality	1.0	1/yr	HR	x	x	x	x	x	x	x	x	x	x	x	x	x	x	x	x	x	x	x	x
Emergency/Incident Management	1.0	1/yr	GM			x	x	x	x	x	x	x	x	x	x	x	x	x	x	x	x	x	x
Inventory Control and Diversion Prevention	1.0	1/yr	Inventory Mgr		x		x	x	x	x	x	x	x	x	x	x	x	x	x	x	x		x
Recordkeeping	1.0	1/yr	GM		x	x	x	x	x	x	x	x			x	x	x	x	x	x	x		x
Product Handling and Sanitation	1.0	1/yr	GM			x		x	x	x	x	x	x	x	x	x	x	x		x			x
*Dispensary Safety	0.5	2/yr	Dispensary Mgr					x	x	x									x				
*Required prior to working on site.																							

Chestnut Hill Tree Farm, LLC will utilize training offered by Americans for Safe Access (ASA) for its employees, in addition to custom internal training. The ASA training was created as a supplement to the Patient Focused Certification program. The certification program audits cannabis businesses for compliance with the American - Herbal Products Association recommendations to regulators for health and safety of patients and employees. The program was developed by many medical, scientific, and cannabis experts including one of our advisors. She will recuse herself from reviewing and approving our final certification as the Review Board Chair. Americans for Safe Access has scheduled private onsite training as part of the certification for all the company's staff in October 2015, if licensed. The company plans to hold annual onsite training for all employees so that onboarding employees receive the same training as the initial staff.

The American's for Safe Access training covers all the company's required topics including:

A. CORE CANNABIS CERTIFICATION (CCC): The CCC training provides the foundation for PFC required trainings and is a prerequisite for additional training. All PFC auditor trainees are required to successfully complete the CCC. The CCC courses address the following topics.

1. CANNABIS RESEARCH AND CLINICAL DATA: Find out what research is revealing about the therapeutic potential of cannabis, and learn what types of pain, disorders and diseases this plant potentially relieves. Clinical trials and their importance are also covered. Finally, see what groundwork has been laid for future cannabis research.

2. THE ENDOCANNABINOID SYSTEM: This module gives a brief history of opioids and cannabinoids, and explains how the endocannabinoid system was discovered. The workings of the endocannabinoid system as well as the physiological role of endocannabinoids are also discussed.

Part 3.C.2.g. Training programs for employees addressing: i. The Health Insurance Portability and Accountability Act (HIPAA); ii. Patient education; iii. Compliance; iv. Patient counseling; and v. Data collection.

3. CANNABIS 101: Gain a fundamental understanding of the cannabis plant by learning the varieties of cannabis and their uses, the most common cannabinoids, the effects of cannabis, and the difference between psychoactive and non-psychoactive cannabinoids.

4. CANNABIS-BASED MEDICINES: Cannabis-Based Medicines covers the cannabis pharmaceuticals that are currently available. It also takes a look at cannabis extracts and concentrates and how they might be used. The module concludes with a section on cannabis edibles and a brief discussion about how cannabis might be incorporated into food and drink.

5. QUALITY OF CARE: Targeted at dispensary workers, this module covers customer service, how to identify and handle medical emergencies, and patient education. A discussion of the Patient's Bill of Rights finishes the module.

6. KNOW YOUR RIGHTS: This module prepares you for interactions with federal law enforcement (FLE). Know what to do in event of detainment or arrest as well as how to answer questions from FLE. Finally, understand when Miranda warnings apply.

7. RAID PREPAREDNESS: Cannabis businesses are still at risk for being raided. Know what to do should this happen. In this module, learn what operations should be followed during a raid. Discover what legal and logistical preparations should be taken as well as how to activate supporters. Knowing how to handle those inside and out- side of the raided facility is also an important consideration. Finally, learn what steps should be taken after a raid is over.

8. RUNNING A SAFE BUSINESS: Dispensaries, growers, and processing centers alike need to take precautions to ensure the safety of their product. Learn how to spot contaminants and maintain safe and sanitary conditions. Security considerations will also be discussed. The module concludes with tips on neighborhood and community relations.

B. NATIONAL STANDARDS COURSES: The National Cannabis Standards Training(s) are designed to educate attendees about the particulars of compliance with the discipline specific AHPA and AHP guidelines and are available in four cannabis industry disciplines. PFC auditors are required to successfully complete the National Standards Course work in the discipline(s) that the auditor will be working in. For example, all auditors who will be auditing cultivation and/or processing facilities must successfully complete the National Standards Course in Cultivation and Processing.

1. CULTIVATION AND PROCESSING: Based on the AHPA Recommendations to Regulators for Cultivation and Processing operations, this training applies to all types of cultivation operations: outdoor, greenhouse, and indoor cultivation facilities. This training is designed to provide learners with the skills necessary to implement Good Cultivation Practices including pesticide guidance, facility requirements, water resource management, recordkeeping, product safety recall systems, adverse event recording, and information disclosure. This course also explores best practices and safe handling procedures for operations that provide post-harvest processing of cannabis.

2. MANUFACTURING, PACKAGING, LABELING AND HOLDING: Designed for individuals engaged in the manufacturing of cannabis and cannabis-derived products, this training is designed to provide learners with the tools necessary to comply with General Management Practices including general personnel responsibility and safety, physical condition of the plant and surrounding grounds, manufacturing controls, packaging, holding and

labeling controls, cannabis material acquisition, inventory and recordkeeping, fielding and documenting complaints and product returns, product safety recalls, and adverse event recording.

3. LABORATORY ANALYSIS: Designed for individuals performing laboratory analysis of cannabis, cannabis-derived products, and hemp products, this course has been developed to educate learners on good laboratory practices and focuses on facility security, sample handling and disposal, data management, personnel safety and hygiene, and reporting activities that may be unique to laboratories analyzing cannabis, cannabis- derived products, and hemp samples.

4. DISTRIBUTION: This comprehensive training is designed to provide participants with the skills necessary to implement Best Management Practices relating to the distribution of cannabis and cannabis-derived products directly to compliant individuals through storefront operations, delivery services, direct-from-garden operations, and growing co-op operations. This training includes information regarding personnel policies, facility security, product acquisition, record keeping, customer policies, implementable product safety recall systems, and adverse event recording.

II. IN-PERSON TRAININGS: PFC certified instructors teach all in-person trainings. The following trainings will be made available in workshop format, allowing multiple courses to be taken in one day. Workbooks, handouts, and hands on learning exercises will be included in the cost of the in-person courses.

A. PESTICIDE GUIDANCE AND INTEGRATED PEST MANAGEMENT (IPM): This in-person course is required for all auditors who will be inspecting cultivation and processing facilities. During this course, auditors are familiarized with key definitions pertaining to pesticides and learn how to properly read a pesticide label. The course will also explore the importance and function of tolerance thresholds, major chemical families, Restricted Entry Intervals (REI's), and Personal Protective Equipment (PPE's) as well as employee safety and employer responsibilities. The second portion of this course covers the key components to successful IPM.

B. SUSTAINABILITY, SANITATION, AND RECORD KEEPING FOR CULTIVATION FACILITIES: This course is required for all PFC auditors engaged in cultivation and processing inspections. Designed to help cultivators reduce their impact on the environment, this course provides tools for reducing the carbon footprint of cultivation operations as well as the use, recycling and reuse of mediums. In addition, this course discusses appropriate nutrient use, the consequence of mined and imported materials, and the proper storage of chemicals. Water sources, use, storage and reduction techniques are also addressed in this course as is the proper tracking of materials used during the cultivation process.

Part 3.C.2.h. Any awards, recognition or certifications received for relevant expertise

SUSAN BAUMGARTNER, PHARM.D., MBA – CHIEF OPERATING OFFICER

Susan Baumgartner is a Doctor of Pharmacy and Master of Business Administration; both degrees were earned with the highest honors. She has completed HIPAA training and possesses significant experience handling confidential information. Baumgartner was a key member of the Executive Management Team and Board of Directors for a startup company in Alachua County that licensed patient monitoring technologies from the University of Florida.

She has received the following awards and recognition for outstanding service, performance, and leadership in her educational and professional endeavors:

- Vice President's Distinguished Service Award and Marketer of the Year Award at Merck
- Perry A. Foote Award for Distinguished Scholarship (Top Graduate in the Doctor of Pharmacy Program)
- American Pharmaceutical Association – Academy of Students of Pharmacy Mortar and Pestle Professionalism Award
- Beta Gamma Sigma Business Honor Society
- Member, National Advisory Board for University of Florida College of Pharmacy (2008 – 2009)
- University of Florida Outstanding Young Alumni Award (2007)

MARGARET GEDDE, PHD - ADVISOR

In recognition of Dr. Margaret Gedde's research accomplishments, she was asked to speak as part of a departmental presentation to the new Chairman of the Board of Trustees of the University of Pennsylvania. In response to her competitive grant application titled "Structural Basis of the pH Dependence of the Bacterial Pore-Forming Toxin Listeriolysin O," she was awarded a Howard Hughes Medical Institute Physician Postdoctoral Fellowship (three years of support), and was also supported by an NIH Infectious Diseases and Virology Training Grant. The work resulted in three original research articles (two as first author or equivalent), an oral platform presentation at a national meeting, three poster presentations at national and international meetings, and numerous other oral presentation venues including NIH Training Grant and School of Public Health seminar series, the UC Berkeley Molecular and Cell Biology departmental retreat, and the HHMI Annual Meeting of Fellows.

JILL LAMOUREUX - ADVISOR

As a nationally recognized cannabis business expert in Colorado with extensive experience in cultivation, manufacturing and distribution, Jill Lamoureux was the only industry representative to serve on both the Colorado Department of Public Health and Environment and the Colorado Department of Revenue medical Derivative Products advisory committees. She also serves as a subject matter expert to BOTEC Analysis Corporation for Washington State. Lamoureux has served on the board of the following organizations and workgroup appointments:

- Colorado Department of Health and Public Environment Medical Marijuana Workgroup, 2009- 2010
- National Cannabis Industry Association, Chair, 2010-2012
- Department of Revenue Medical Marijuana Rulemaking Workgroup, 2010-2012
- City of Denver Medical Marijuana Workgroup, 2011-2012
- American Herbal Products Association Cannabis Committee, 2013-Current

KRISTOPHER M. PALMER - CONSULTANT

Kristopher Palmer is a Nationally Certified Thermographer, certified by the Infrared Training Center. This has allowed him to apply thermal imaging to cultivation operations to improve garden and building efficiencies.

RICHARD TEMPEL, MD – MEDICAL DIRECTOR

Dr. Richard Tempel has received many high awards and honors throughout high career. These accomplishments include:

- Title of Chief Resident, Division of Emergency Medicine, Department of Surgery, DUMC, 200506
- Graduating Resident of the Year 2006, Duke University Medical Center
- Teaching Resident of the Year, 2006, Duke University Medical Center
- Golden Key National Honor Society, University of Maryland College Park, 1998-1999
- Citation in Archaeology, University of Maryland College Park, 1999

Additionally, Dr. Tempel has been asked to provide the following lectures:

- Dangerous Substances and Medicinal Marijuana. Celebration, FL, 2009
- Allergy and Anaphylaxis Florida Emergency Medicine Residency Conference. Orlando, FL
- Electrolyte Disorders, Florida Emergency Medicine Residency Conference. Orlando, FL
- Introduction to Emergency Ultrasound Lecture, 2008 Radiology Forum, Upper Chesapeake Medical Center. Bel Air, MD

Dr. Tempel is a member of the following professional organization:

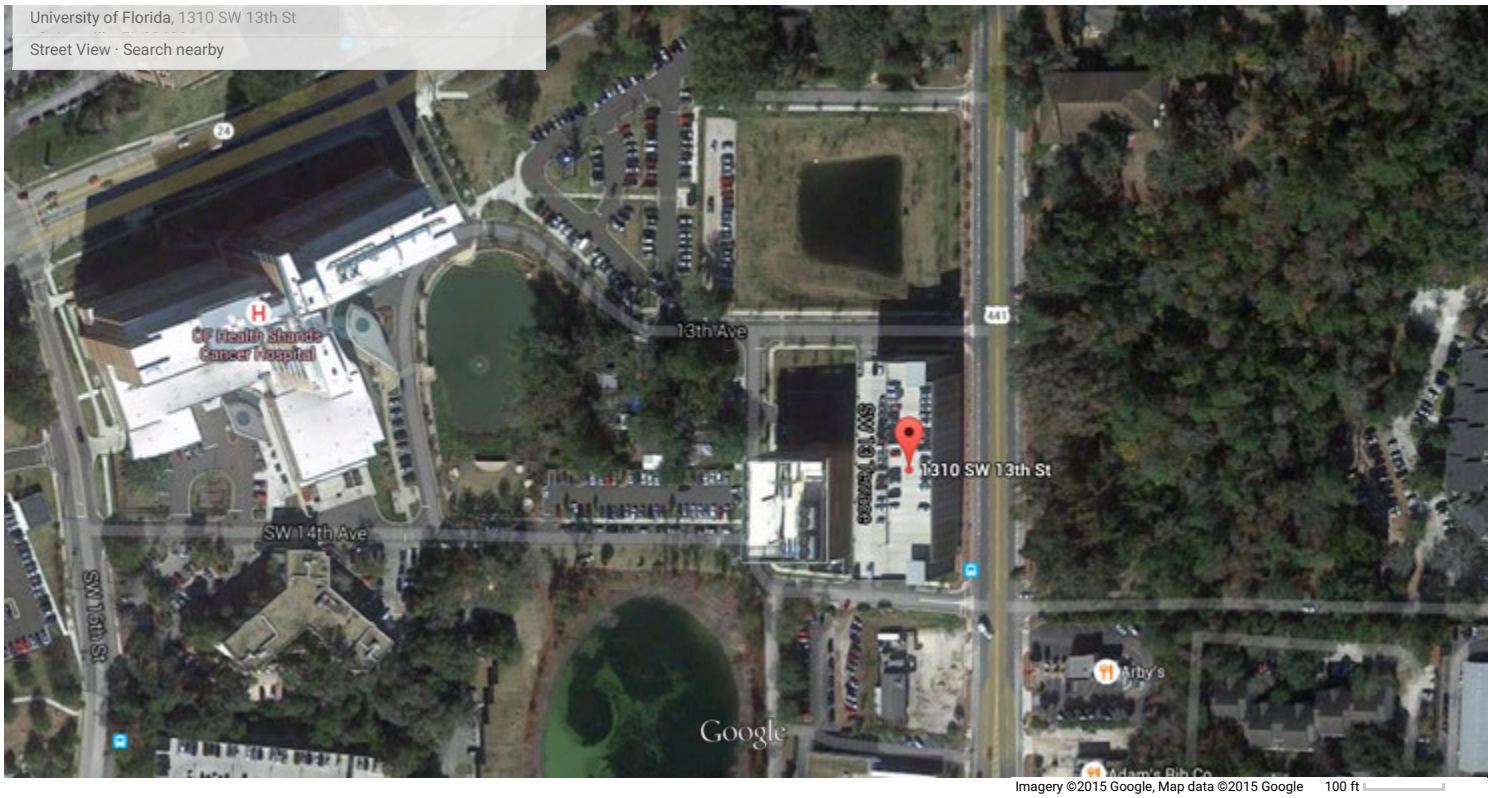
- Fellow of the American College of Emergency Physicians (ACEP), Florida Chapter
- Fellow of the American Academy of Emergency Medicine (AAEM)
- American Medical Association, Florida Chapter (FMA)

2. INFRASTRUCTURE

Part 3.C.2.a. A map showing the location of the applicant's proposed dispensing facilities

Chestnut Hill Tree Farm has secured two potential dispensary locations. The second location serves as a back-up to the first location if for any reason the facility cannot be established at that location. A status regarding zoning determinations for Dispensing Organizations from the City of Gainesville is included for reference. The City has not determined the appropriate use code(s) and still has the matter under consideration. The second facility is currently approved by Alachua County.

1. 1310 SW 13th St.., Unit 4, Gainesville, FL 32601
2. 422 SW 140th Terrace, Newberry, FL 32669



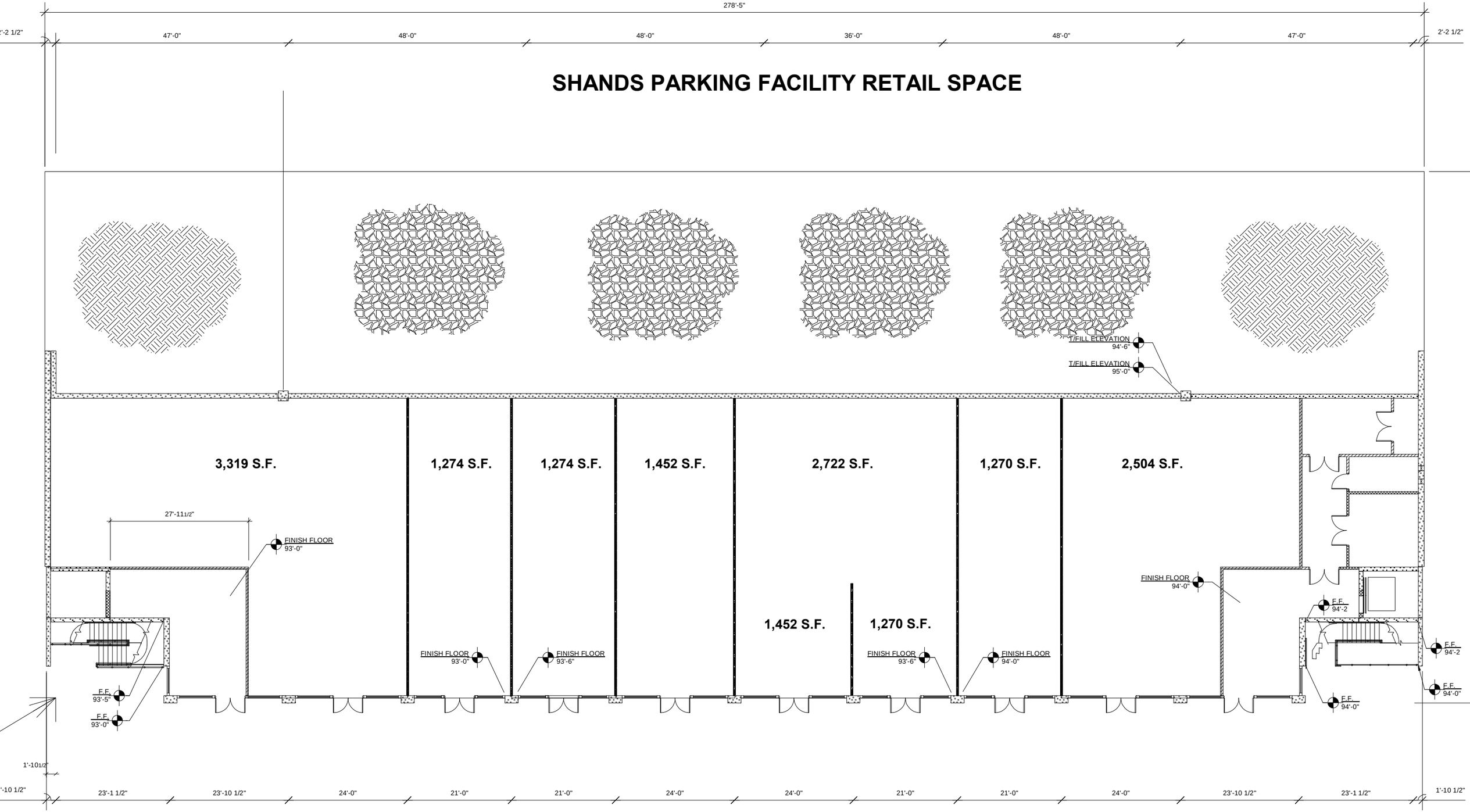
1310 SW 13th St., Gainesville, FL

422 SW 140th Terrace, Newberry, FL 32669

Part 3.C.2.b. A sketch or other illustration of the actual or proposed dispensing locations showing streets; property lines; buildings; parking areas; outdoor areas, if applicable; fences; security features; fire hydrants, if applicable; and access to water and sanitation systems

Part 3.C.2.b. A sketch or other illustration of the actual or proposed dispensing locations showing streets; property lines; buildings; parking areas; outdoor areas, if applicable; fences; security features; fire hydrants, if applicable; and access to wate

SHANDS PARKING FACILITY RETAIL SPACE



GROUND LEVEL

1310 SW 13th St., Gainesville, FL

9 January, 2008

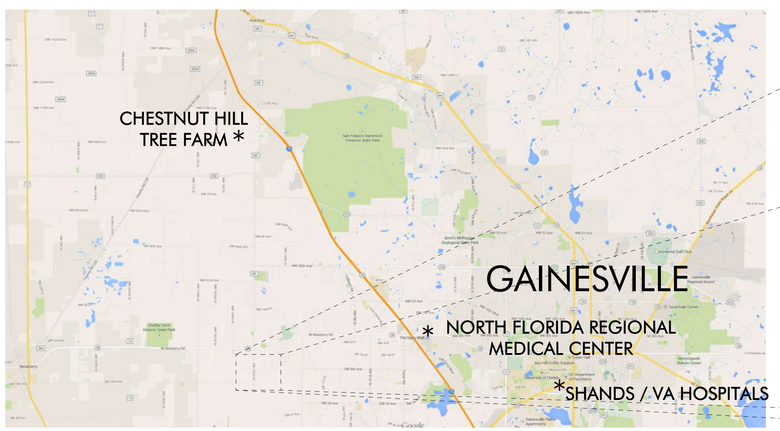
Shands at UF Cancer Hospital

Phase I Site Plan

- Main entry - Archer Road
- ED entry - SW 16th Street
- Healing Garden
- Internal Circulation Route
- Central Utility Plant
- Surface Parking & Future Garage

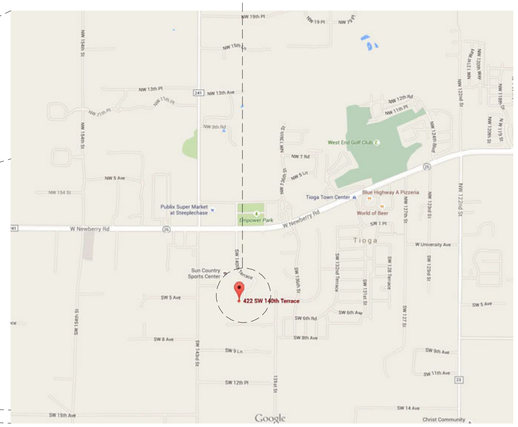
DISPENSARY AT 422 SW 140TH STREET NEWBERRY, FL

PROJECT VICINITY



LOCATION MAP

PROJECT LOCATION



INDEX OF DRAWINGS

GENERAL

G010	COVER SHEET

ARCHITECTURAL

A100	SITE PLAN
A101	GROUND FLOOR PLAN
A102	GROUND FLOOR SECURITY PLAN

CONSULTANT:

DISPNSARY AT 422 SW 140TH STREET

NEWBERRY, FL

CONCEPT

WA PROJECT NO.:

DRAWN BY:

ISSUE DATE: 7/2/2105

REVISION SCHEDULE

REVISION NO.	REVISION DATE

SHEET TITLE: COVER SHEET

SHEET NO.: G010

CONSULTANT:

DISPNSARY AT 422 SW 140TH STREET

NEWBERRY, FL

CONCEPT

WA PROJECT NO.:

DRAWN BY:

ISSUE DATE:

7/2/2105

REVISION SCHEDULE	
REVISION NO.	REVISION DATE

SHEET TITLE:

SITE PLAN

SHEET NO.:

A100

Part 3.C.2.c. A floor plan of the actual or proposed building or buildings where dispensing activities will occur showing: i. Areas designed to protect patient privacy; and ii. Areas designed for retail sales.

Part 3.C.2.c. A floor plan of the actual or proposed building or buildings where dispensing activities will occur showing: i. Areas designed to protect patient privacy; and ii. Areas designed for retail sales.

[redacted]

CONSULTANT:

DISPENSARY IN RETAIL CENTER AT SHANDS
SOUTH PARKING GARAGE

1334 SW 13TH STREET GAINESVILLE, FL

CONCEPT

WA PROJECT NO.:

DRAWN BY:

ISSUE DATE:
7/2/2105

REVISION SCHEDULE	
REVISION NO.	REVISION DATE

SHEET TITLE:
GROUND FLOOR PLAN

SHEET NO.:
A101

CONSULTANT:

DISPNSARY AT 422 SW 140TH STREET

NEWBERRY, FL

CONCEPT

WA PROJECT NO.:

DRAWN BY:

ISSUE DATE:

7/2/2105

REVISION SCHEDULE	
REVISION NO.	REVISION DATE

SHEET TITLE:

GROUND FLOOR PLAN

SHEET NO.:

A101

Part 3.C.2.d. A HIPAA compliant computer network utilized by all facilities

BioTrackTHC is fully HIPAA compliant and has undergone strict SAS 70 DEA certification. The Information Technology Manager will ensure all requirements are met and continue to be maintained. Our commitment to excellence, transparency, and accountability are part of our core fundamental infrastructure. The system is a secured program that is password protected and also can be set for Biometric Fingerprint scanning to ensure only authorized personnel will be able to access secure documentation within the system. All the information is stored on a local server that is firewall protected from any outside presence.

Part 3.C.2.e. Vehicles that will be used to transport product among cultivating, processing, and dispensing facilities

Chestnut Hill Tree Farm has selected to purchase two Toyota Prius vehicles with customized climate controlled cargo areas and [redacted]

The manifests provided also contain signature lines creating another level of accountability confirming proper receipt has occurred. This information can be maintained, verified and scanned directly into the BioTrackTHC system for clerical preservation. The manifest is archived within the system and can be quickly made available for internal controls or upon request by the OCU or law enforcement.

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Part 3.C.2.f. Communication systems

COMMUNICATIONS NETWORKS AND HARDWARE

Chestnut Hill Tree Farm currently utilizes and will continue to utilize the following communications software and hardware:

- ESI 50 LITE Communication Server and Phones 2 wire digital Phone System, maintained by Florida Phone Systems.
- Hi Speed DSL from Windstream Communications
- Cell phones to communicate through AT&T

The systems and hardware described above serve as the infrastructure for the company's communication systems. These systems will be maintained regularly. Additionally, the company's policies and procedures provide direction for company operations when critical information systems go down. The BioTrackTHC point of sale system is server based and is developed to automatically update when communication systems come back on line. Cells phones and landlines provide redundancy for voice communications.

BIOTRACKTHC

BioTrackTHC has messaging and email capabilities within the system. This allows managers and employees to communicate with one another without having to open another program or use their cellphones. A manager can send a task list to an employee that is viewable on the same screen where they are inputting data or performing any function within the system.

INTER-COMPANY COMMUNICATIONS

Chestnut Hill Tree Farm has also adopted protocols for internal communications. Due to the highly regulated nature of the company's operation, the quick and effective dissemination of information to employees is critical. Efficient communication is necessary for compliant and efficient operations. Effective internal communication promotes a culture that values employees and enables the company to achieve its strategic goals. The company's internal communications plan addresses the channels used to communicate with internal stakeholders. While the company seeks to foster a culture of inclusion in information sharing, dialogue and decision-making, it should be noted that there may be decisions made at the executive level that cannot, by their nature, be the subject of institution-wide consensus. The protection of private information related to patients and corporate trade secrets is a top priority for management.

In addition to direct means of communication (person-to-person and telephone), the company provides and expects all employees to use and to be aware of the information distributed via the primary means of inter-company communication:

- Electronic mail and calendar
- Voice mail
- Intranet

Official company communication may be sent by any of these above means. All employees are expected, on a regular basis, to accept their mail communication within a reasonable time period from the date of receipt. Employees should also make it known to their supervisor when a communication is not understood; and suggest when and how information could have been communicated more effectively.

OBJECTIVES

- To ensure effective one-way dissemination of information to employees.

- To take advantage of opportunities for dialogue with employees and upward communication.

ONE-WAY COMMUNICATION

The company seeks to provide free and open access for employees to sufficient, consistent, and timely information regarding internal plans and actions so that they are well informed and able to work effectively and in compliance with regulations and company policies and procedures. The company will implement the following one-way communication methods:

- Every employee receives a copy of the company's strategic plan, which includes the organization's mission, vision, values statement, strategic goals and strategies about how those goals will be reached.
- Every employee receives an employee handbook that contains all up-to-date personnel policies.
- Every employee has access to standard operating procedures for their operating unit.
- Every employee receives a copy of their job description and the organizational chart.
- Executive management meetings for director and unit managers will be held bi-weekly.
- Unit meetings will be held by managers weekly.
- All company meetings will be held quarterly.
- Managers will have face-to-face contact with employees in their department at least once a week.
- Meetings will be held to recognize major milestone and accomplishments.
- All employees receive yearly performance reviews, including their goals for the year, updated job descriptions, accomplishments, needs for improvement, and plans to help the employee accomplish the improvements.

Strategy and Methods

Chestnut Hill Tree Farm will disseminate information utilizing the organizational hierarchy.

1. Face to Face Communication in Organizational Unit Meetings

As appropriate, information and issues discussed in executive management meetings is cascaded though the organization starting with weekly staff meetings conducted by executive managers in their respective units. Directors and all other managers who have staff reports have responsibility for sharing/passing along information intended to be disseminated institution-wide in a timely manner. At the end of each executive bi-weekly management meeting, the Chief Executive Officer identifies the agenda items/information that should be communicated throughout the company and directors and managers are then responsible for initiating the information dissemination process.

2. Company Wide Meetings

The Chief Executive Officer will conduct an all company meeting quarterly or as is otherwise deemed necessary. These meetings are intended to convey timely information about organizational issues and/or give the Chief Executive Officer the opportunity to make a "state-of-the-company" address to employees.

Strategy and Methods

The company will disseminate information utilizing internal mass media.

1. Company Intranet

Chestnut Hill Tree Farm will develop and maintain an internal website for company communication. This intranet will assist in the maintenance and organization of company documents including handbooks, forms, operating manuals, and reference links. The purpose of the intranet is to inform employees of the company's business, policies, news, and events, and provide information that helps employees fulfill the company's vision, mission,

core values, and strategic directions. Employees are responsible for logging into the intranet and reviewing new postings on a regular basis.

Oversight**:**

The intranet is managed by the Human Resources Manager and the Information Technology Manager.

Circulation:

The intranet is accessible only by employees with a valid login.

Frequency:

The intranet is accessible at any time by employees with a valid login. The content will be updated as frequently as needed. Every employee with a valid login will receive an email notice of updated material. Depending on the nature of the update, particularly for legal or compliance issues, the posting may require an acknowledgement from the employee that they have reviewed and understand the update.

Content:

Content is subject to editorial discretion in determining what is of interest to the company. Political, religious, or controversial topics are prohibited. All items are provided by managers and subject to editing for reasons of clarity and space. The intranet will provide current copies of all manuals, forms, training videos, and other documents needed for employees to perform their duties. Additionally, blog content will include:

- CEO Notes: provides information from the weekly executive leadership meeting and other news from the Chief Executive Officer.
- Operational Notes: provides information provided by operating units about their news, policy and procedure changes, services, deadlines, etc.
- Medical Cannabis Notes: provides information that educates employees about medical cannabis science, policy, or other issues surrounding medical cannabis.
- Technical Notes: provides employees with reminders or hints for the information technologies used in the company. For example, providing a short cut in the point of sales system.
- Personal Notes: offers personal news about employees or patients and their successes and achievements, both personally and professionally. Due to issues of privacy all information shared will be submitted or approved by the employee or patient.

Submission Instructions:

Content may be submitted via e-mail at any time to the Human Resources Manager. Submissions should include the contributor's name, department, e-mail or phone. Items will be attributed to the contributor unless other attribution is indicated. Publication cannot be guaranteed.

2. All Company E-Mail

The intranet is the preferred method of intercompany communication. Decision to send an all-company e-mail rather than publishing on the intranet is based on whether or not the information that needs to be disseminated is time-sensitive or needs focused attention. Employees who have information that is believed to require institution-wide dissemination and meets either criterion should contact their immediate supervisors to obtain approval for as well as facilitate the sending of an all-company e-mail message. Only managers may send all-company emails unless the email is in regards to an incident response issue in accordance with the company's incident response policies. A list of time-sensitive events includes but is not necessarily limited to the following:

- Deaths
- Inspection or visit notices
- Crisis communication and emergency closings
- IT notices about viruses or imminent problems
- Power/service outages or interruptions
- Public safety advisories
- Parking or construction issues
- Chief Executive Officer messages

3. Broadcast Voice Mail

The Chief Executive Officer has the authority and access to generate a voice mail message to all-users simultaneously. It is at the CEO's discretion as to when and under what circumstances this medium is used. Broadcast voice mail will be utilized for emergency and incident communications.

UPWARD COMMUNICATION

Chestnut Hill Tree Farm will take advantage of and create new opportunities for dialogue with employees and upward communication. The highly regulated structure of the company requires that employees feel comfortable bringing problems, issues, and concerns up the chain of authority. The company will implement the following upward communication methods:

- All employees give regular status reports to their supervisors. The informal email report includes a list of their activities in the past week, their plan for the following week, and a report of any actions, problems, or issues to address.
- All supervisors will meet one-on-one at least once a week with their employees to discuss current operations, acknowledge any concerns from the employee, etc.
- Executive management and staff meetings will provide opportunity to provide feedback. A round table approach to hear from each person will be utilized to solicit participation.
- All feedback will receive a management response, even if only to say no action will be taken on the reported problem or suggestion, etc. and the reason why.
- "Grapevine" communication is one of the most prevalent and reliable forms of communications and will not be discouraged unless it negatively impacts morale. Major "movements" in the organization usually first appear when employees feel it safe to venture their feelings or opinions to peers.

Strategy and Methods

Chestnut Hill Tree Farm will formalize institutional opportunities for dialogue and upward communication.

1. Review, Recommendation, Feedback/Consensus Process

While for legal and compliance reasons there are some decisions that will be made unilaterally by the executive management team, the company values decision-making at all levels and places an importance on involving affected employees in the decision-making process when possible and appropriate. The review, recommendation, feedback, consensus process for seeking company input is as follows:

- Policies, regulations, processes or issues that may have a company-wide impact are discussed as an agenda item at a regular meeting of the executive management team.

- An item is placed on the agenda by the Chief Executive Officer or at the request of another executive management team member.
- If the agenda item is determined to have a company-wide impact and broad-based company input is appropriate, the executive management team assigns it for review and recommendation to a group of managers selected by the CEO.
- The manager group will seek feedback from their operating unit's employees and make a recommendation to the executive management team.
- After the executive management team reviews the document or recommendation, either consensus is reached and the document or recommendation is approved or the document is returned to the manager group for further consideration.
- The cycle begins again until consensus is reached.

Employees may request that an item be placed on the executive management team meeting agenda. This request should be made to and carried forward by the immediate supervisor. Should a determination be made by the Chief Executive Officer that the issue will not be placed on the executive management team agenda, the supervisor will apprise the employee as to the rationale.

2. Communication Liaison

In an effort to ensure that every employee has the opportunity to bring ideas and issues of concern to the attention of the executive management team, each operating unit's manager will serve as communication liaisons between staff and the Chief Executive Officer. The communication liaison's primary responsibility is to bring ideas, issues and concerns to the CEO on behalf of individual employees.

While members of the executive management team maintain an open door policy and the communication liaison provides employee access to the CEO, employees with issues and concerns are encouraged first to pursue standard administrative channels.

3. Company Forums and Focus Groups

When there is detailed information about an issue that needs to be presented company-wide and requires the opportunity for questions and input, a forum format may be utilized. From time to time the company will seek input from employees about various aspects of the organization. Focus groups consisting of 5 to 10 employees are facilitated by company directors or an outside facilitator.

Part 3.C.2.g. Hours of operation of each dispensing facility

HOURS OF OPERATION

The dispensary will be open from 7:30am until 7:30pm daily. Staff will be required to arrive 30 minutes prior to opening and remain 30 minutes after closing. Only staff designated to work during a given shift will be given permission to be in the facility. The facility may be used to hold occasional staff meetings, at which times unscheduled staff might be onsite.

Based on sales volume, delivery schedules, patient feedback, and with consideration for the local zoning and the surrounding community, the company will expand or contract hours of operation and days of operation. It will consider many alternative schedules such as later evenings or earlier morning starts to accommodate the needs of patients. The company will work with its patients, employees, and the communities to optimize this schedule for all parties.

BIOTRACKTHC

Within BioTrackTHC, there are numerous sales and inventory reports that can identify the exact time a sale was made, the items dispensed and the employee that made the transaction. Additionally, BioTrackTHC requires that each patient be added to the system with all relevant information before a sale can be made. This information includes the quantity that that patient is allowed to purchase based on the information regarding the prescribed product that is captured in the state registry. Patient sales amounts and date ranges can be automatically set within the system to prevent any transaction outside of permitted limits. The time sales occur can be set in the system to prevent sales outside of hours of operation.

METHODS FOR ASSESSING AND MITIGATING ODOR IMPACTS

Each operating day the Dispensing Manager or designee will evaluate on-site odors and operations for potential release of objectionable odors. If questionable or objectionable on-site odors are detected by management, the company will implement the following protocols:

- Investigate and determine the likely source of the odor.
- Access the effectiveness of available on-site management practices to resolve the odor event and immediately take steps to reduce the odor-generating capacity of on-site material.
- Determine if the odor traveled off-site by surveying the site perimeter and noting odor from the facility.
- Record the event for further operational review.

OPERATING DESIGN FOR MINIMIZATION OF ODORS

The company only stocks pre-packaged and sealed Derivative Products in the dispensary and prohibits the opening of medical cannabis packages and administration of medical cannabis on-site. A standalone carbon filter will be kept onsite in case of any odor incident.

3. PREMISES, RESOURCES, AND PERSONNEL

Part 3.C.3.a. Location of all properties Applicant proposes to utilize to dispense Derivative Products, including ownership information for the properties and any lease terms if applicable

i. For any property that is leased by the Applicant, include documentation that the property owner consents to the use of the property for the purposes of dispensing Derivative Products and documentation that the mortgagor or lienholder has been given notice of the use of the property for the purpose of cultivation of low-THC cannabis; and

ii. For any property owned by the Applicant but subject to a mortgage or lien, include documentation that the mortgagor or lienholder has been notified of the use of the property for the purpose of dispensing Derivative Products.

The site at 422 SW 140th Terrace, Newberry, FL 32669 does not carry a mortgage and the landlord approves the use within the lease.

THE EQUILEASE GROUP

6/24/15

This Agreement between Equilease of Gainesville and Chestnut Hill Tree Farm LLC. Is entered into and made a part of the lease signed between the aforementioned parties on June 19th, 2015 with regard to a commercial space located at 422 SW 140th Terr., Newberry, Florida 32669.

Equilease agrees to hold 422 SW 140th Terr. until August 8th, 2015 for Chestnut Hill Tree Farm LLC. for a fee of $1,000.00 payable to Equilease of Gainesville, Inc.

Should Chestnut Hill Tree Farm LLC. Not receive a formal license to conduct business, or should Chestnut Hill Tree Farm LLC. decide to locate at an alternate location, the complete lease document shall become null and void as of August 8th, 2015.

Landlord: _____ Tenant: _____
Robert Wallace

Date: 6/24/15 Date: 6/24/15

3501 SW 2nd Ave. Suite 2400 Gainesville, FL. 32607 Phone: (352) 377-7223 Fax: (352) 377-7329

LEASE AGREEMENT

THIS LEASE AGREEMENT made and entered into this 24th day of June, 2015, by and between Equilease of Gainesville, Inc. or assigns (referred to as "Landlord"), And Chestnut Hill Tree Farm LLC. (referred to as "Tenant");

WITNESSETH:

1. Premises: Landlord hereby leases premises to Tenant, and Tenant leases and accepts, certain premises the Landlord has constructed, or proposes to construct, the address of which is , 422 SW 140th Terr., Newberry, FL. 32669 the demised premises (the "demised premises" or "premises") herein being approximately: 9,164 square feet

2. Term: The original term of this Lease shall be for a period of Three (3) years (the "Base Term") from the "Commencement Date" hereinafter provided unless sooner terminated hereby. Said term, and Tenant's obligation to pay rent, shall commence on August 8th, 2015. Tenant shall be required to open the premises for business within sixty (60) days from commencement date. Rent shall be paid in equal monthly installments in advance on the first day of each month during the term of this Lease.

3. Minimum Rent: Tenant shall pay to the Landlord as minimum rent the amounts specified in the rent addendum attached hereto and made a part hereof.

4. Pro-Rata Share of Real Estate Taxes, Insurance Premiums and Common Area Maintenance Expenses: (Collectively hereafter referred to as " C.A.Ms") Tenant shall remit to the Landlord as additional rent its Pro-Rata Share, as hereinafter defined, multiplied by the real estate taxes, insurance premiums, and common area maintenance expenses incurred by the Landlord in connection with the operation of the Shopping Center. Tenant's Pro-Rata Share shall be a fraction, the numerator of which shall be the number of square feet (9,164) in the premises and the denominator of which shall be the total number of square feet (27,098) in the Shopping Center for which the Landlord is obligated to make payment, the Tenant acknowledging and agreeing that the area leased by other tenants may be separately assessed for tax purposes, or such other tenants may obtain their own insurance or maintain their own common areas. Tenant shall pay its Pro-Rata Share of the above expenses within twenty (20) days after receipt of a bill therefor.

The term "real estate taxes" shall mean all taxes and assessments (special or otherwise) levied or assessed against the Shopping Center (land, buildings and

improvements), and other taxes arising out of the use and/or occupancy of the premises imposed by any federal, state or local governmental authority or any other taxing authority having jurisdiction over the Shopping Center (including expenses directly incurred by Landlord in contesting the validity of, in seeking a reduction in, or seeking to prevent an increase in any such tax(es) or assessment(s), but shall exclude franchise capital stock estate or inheritance taxes personal in nature to Landlord).

In addition to Tenant's proportionate share of real estate taxes. Tenant shall pay any and all sales, excise receipts and other taxes (not including, however, Landlord's income taxes) levied, imposed or assessed by the state in which the Shopping Center is situate or any political subdivision thereof or other taxing authority (be it federal, state, local or otherwise) upon any amounts payable hereunder.

The term "insurance premiums" shall mean the premiums charged for fire and extended coverage insurance on the improvements constructed and/or installed by the Landlord in the center and for rent insurance thereon, together with premiums charged for liability insurance on the common areas in the Shopping Center, and any other reasonable insurance costs incurred in the normal course of business.

The term "common area maintenance expenses" shall mean the total cost and expense incurred in operation, maintaining, cleaning and repairing the common areas including, without limitation, landscaping and gardening, maintenance, repair and replacement of parking lot, line painting, lighting, traffic control, if any, sanitary control, the cost of personnel to implement such services and to direct parking and to police the common areas, music or other communication systems for the Shopping Center, depreciation of heating, ventilating and air conditioning equipment for the common areas and the Shopping Center roof and a reasonable sum to cover the administrative costs relative to the operation of the said common areas.relative to the operation of the said common areas.

5. Liability and Contents Insurance and Maintenance Expenses: Tenant is responsible for Liability and Content Insurance. In addition Tenant shall be responsible for the building maintenance and expenses described below. In the event that Tenant is unwilling or unable to keep the property in "good condition" Landlord shall have the right to provide or contract for repairs or maintenance necessary to protect the structure of the property and to assure that the exterior of the property and grounds are in similar condition to that in which the building were delivered to Tenant. "Good Condition" shall be defined as substantially the same condition that property was in when Tenant and Landlord initiated the lease, allowing for normal wear and tear.

Tenant shall pay any and all sales, excise receipts and other taxes (not including, however, Landlord's income taxes) levied, imposed or assessed by the state in which the Property is situate or any political subdivision thereof or other taxing authority (be it federal, state, local or otherwise) upon any amounts payable hereunder.

5. Tenant's Use and Operation: the demised premises shall be used and occupied by Tenant solely as a Medical Marijuana Dispensary and Corporate office, and for no other use without Landlord's prior written consent Tenant shall comply with all rules, regulations and laws of any governmental authority with respect to use and occupancy of the premises.

Tenant shall not use and does not intend to use any portion of the leased premises to generate, manufacture, refine, transport, treat, store, handle or dispose of any hazardous substances.

Tenant shall not suffer, allow or permit any vibration, noise, light, odor or other effect to emanate from the premises, or from any machine or other installation therein, or otherwise suffer, allow or permit the same to constitute a nuisance or otherwise interfere with the safety, comfort or convenience of Landlord or any of the other occupants of the Property or their customer, agents or invitees or any others lawfully in or upon immediately remove or control the same. Tenant shall not use or occupy the premises or do or permit anything to be done which shall prevent Landlord from obtaining at standard rates any insurance required or desired.

7. Utilities: Tenant shall pay promptly, as and when the same shall become due and payable, all water rates and charges, all sewer rates and all charges for electricity, gas, heat, steam, hot and/or chilled water, air conditioning, ventilating, lighting systems, sprinkling systems and other utilities supply the premises. The Tenant shall not be allowed access to the premises until all utilities are transferred to the Tenant.

8. Signs: Tenant shall not place on any exterior door, wall or window of the premises any sign or advertising matter without first obtaining Landlord's written approval and consent. Tenant agrees to maintain such signs or advertising matter as approved by Landlord in good condition and repair. All signs shall comply with applicable ordinances or other governmental restrictions and the determination of such requirements and the prompt compliance therewith shall be the responsibility of the Tenant.

9. Tenant's Duty to Repair; Alterations: Except for the repairs to be performed by Landlord, Tenant shall keep and maintain in good order, condition and repair (including any such replacement and restoration as is required for that purpose) the interior and exterior of the premises and every part thereof and any and all appurtenances thereto wherever located, including, without limitation, the exterior and interior portion of all doors, window, plate glass, store front, all plumbing and sewage facilities within the premises including free flow up to the main sewer line, fixtures, heating and air conditioning and electrical systems (whether or not located in the demised premises), sprinkler systems, walls, floors and ceiling, meters applicable to Tenant's premises, and all installations made by Tenant under the terms of this Lease and any exhibits thereto, as herein provided. Tenant shall not make any material alteration of, or addition or improvement to the premises without securing the Landlord's prior written consent. Tenant shall save Landlord harmless on account of claims for mechanics, materialmen's or other liens in connection with any work by tenant, and any such liens shall exist only against Tenant's leasehold interest and shall be discharged, by bond or otherwise, within thirty (30) days after filing. Tenant shall keep and maintain the premises in accordance with all directions, rules and regulation of the proper officials of the government agencies having jurisdiction, at the sole cost and expense of Tenant, and tenant shall comply with all requirements of lay, by statute, ordinance or otherwise affecting the premises and all appurtenances thereto.

10. Surrender of Premises: At the termination of the Base Term, or any renewal term thereof, or should the Tenant be deemed to be in default, the Tenant agrees to deliver the premises in the same condition as received by it on the Commencement Date (subject to the removals hereinafter required), reasonable wear and tear excepted, and shall surrender all keys for the premises to Landlord at the place then fixed for the payment of rent and shall inform Landlord of all combination locks, safes and vaults, if any, in the premises. Installation of all fixtures and equipment on premises by lessee shall be deemed to become a part of the leased premises and shall become the property of the Lessor and shall not be removed from the premises at the end of the lease term without express authorization of the Lessor. Tenant, during the last thirty (30) days of such term, shall remove all its unattached trade fixtures, and, to the extent required by Landlord by written notice, any other installations, alteration or improvements, before surrendering the premises as aforesaid and shall repair any damage to the premises caused by removal of such items. Tenant's obligation to observe or perform this covenant shall survive the expiration or other termination of the lease term. Any items remaining in the premises on the termination date of this Lease shall be deemed abandoned for all purposes and shall become the property of Landlord and the latter may dispose of the same without liability of any type or nature

11. Landlord's Duty to Repair: Landlord shall keep and maintain in good repair the foundation, exterior walls and roof of the building in which the premises are located

and the structural portions of the premises which were installed by Landlord, exclusive of doors, door frames, door checks, windows, and window frames located in exterior building wall. Landlord shall not be called upon to make any other improvements or repairs of any kind upon the premises and appurtenances. Any of the foregoing repairs required to be made by reason of the negligence of Tenant, its agents, etc., as above described, shall be the responsibility of the Tenant notwithstanding the provisions above contained in this paragraph.

12. Liability of Tenant; Insurance: Tenant shall protect, indemnify and save Landlord harmless from and against all and any liability and expense of any kind, including reasonable attorneys' fees, arising from injuries or damages to person or property in, on or about the premises arising out of or resulting in any way from any act or omission of Tenant, its agents, invitees, servants and employees, in the use of the premises during the term of this Lease. Tenant shall carry public liability insurance covering the premises and the use and occupancy of the same in a company or companies licensed to do business in the state where the premises are located under a policy satisfactory to Landlord both as to amount and coverage.

Tenants Insurance Requirements

a) Liability	b) Property
$500,000 per person	$500,000 per accident
$1,000,000 per accident	

The policy shall contain a provision that it may not be canceled without first giving Landlord not less than thirty (30) days prior written notice. Tenant agrees not to keep upon the premises any articles or goods which may be prohibited by the standard form of fire insurance policy. It is agreed between the parties that in the event the insurance rates applicable to fire and extended coverage insurance covering the within premises shall be increase by reason of any use of the premises made by the Tenant, then Tenant shall pay to Landlord such increase in insurance as shall be occasioned by said use. Tenant agrees that if any property owned by it and located in, on or about the premises shall be damaged or destroyed by an insured peril, Landlord shall not have any liability to Tenant, nor to any insurer of Tenant, for or in respect to such damage or destruction, and Tenant shall require all policies of risk insurance carried by it on its property in, on and about the premises to contain or be endorsed with a provision in and by which the insurer designated therein shall waive its rights of subrogation against Landlord.

13. Damage or Destruction by Fire or Other Casualty: If at any time, the premises become totally untenantable by reason of damage or loss by fire or other casualty and such fire or other casualty shall not have been caused by the negligence or wrongful act or omission of Tenant, Tenant's servants, agents, licensees, or invitees, the rent shall abate until the premises shall have been restored to tenantable condition, but nothing herein is to be construed as requiring Landlord to restore or rebuild the premises. If the premises are so damaged, but not to the extent that they are totally untenantable. Tenant

shall continue to occupy same or the tenantable portion thereof, and the rent shall abate proportionately in the ratio that the unusable portion bears to the entire premises. In the event of a loss from fire or other casualty, Landlord shall have an election not to rebuild or recondition the premises, which election shall be exercised by written notice thereof to Tenant, given within sixty (60) days from date of said loss. If Landlord exercises such election, this lease shall cease and terminate, effective on the date of such loss, and Tenant shall pay the accrued rent up to date of such loss, or Landlord, if the rent has been paid beyond such date, will refund to Tenant the proportionate part of any such

rent prepaid, and thereupon this lease shall become null and void, with no further obligation on the part of either party hereto, even thought the building may at a later date be rebuilt, restored or reconditioned. No damage or destruction shall allow Tenant to surrender possession of the premises, nor affect Tenant's liability for the payment of rent, except as specifically provided in this lease.

14. Tenant Assignment and Subletting: (a) Neither Tenant nor any court or officer there of nor any receiver or trustee in bankruptcy shall assign or transfer this lease or any part thereof, or interest therein, or sublet the premises or any part thereof without Landlord's prior written consent. Tenant shall always remain liable for any default of any assignee, transferee or subtenant. The consent by Landlord to any assignment, subletting or use of the premises by others shall not constitute a waiver of Landlord's right to withhold its consent to any other assignment, subletting or use by others of the premises. If Landlord consents to any proposed assignment or subletting, Tenant shall pay to Landlord in advance, as additional rent, an administrative fee of Five Hundred Dollars ($500.00). Tenant shall not request the consent of Landlord to any subletting which provides for a rent per rentable square foot basis of less than the Landlords then asking price per rentable square foot for space in the property, and no such subletting shall be permitted. The absolute and unconditional prohibitions set forth in this section 14 (a) and Tenant's agreement thereto are material inducements to Landlord to enter into this Lease with Tenant, and any breach or attempted breach thereof shall constitute an event of default under this Lease for which no notice or opportunity to cure need be given.

(b) No consent by Landlord to an assignment of this Lease shall be effective unless and until Tenant shall deliver to Landlord an agreement, in form and substance satisfactory to Landlord, pursuant to which such assignee assumes and agrees to be bound by all of the provisions of this Lease. In no event shall Tenant be released from its obligations hereunder as a result of any assignment of this Lease, and the Tenant named herein and any assignee of such Tenant who assumes the obligations of the named Tenant under this Lease, from and after such assignment, shall be jointly and severally liable for performance of all obligations of Tenant under this Lease.

(c) If the rent and other sums payable to Tenant by an assignee or sublessee for or in connection with an approved assignment of this Lease or the sublease of all or any part of the premises shall be in excess of the Base Rent and any Additional Rent

provided for in this Lease (allocated on a per square foot basis in the event of an approved sublease of less than all of the premises), Tenant shall so notify Landlord and shall pay Landlord one hundred percent (100%) of such excess as and when received by Tenant at the Landlords option.

15. Default: In the event the premises become deserted, or stand vacant, or if Tenant be in default, whether in the payment of rent or in the performance of any covenant, agreement, obligation, or condition herein contained, or in the event the Tenant shall become insolvent, or file a petition in voluntary bankruptcy, or have an involuntary petition in bankruptcy filed against it. Landlord may at Landlord's option and without notice to Tenant, which is hereby expressly waived, at any time declare this lease terminated and this lease shall expire as fully and completely as if that day were the date herein originally fixed for the expiration of the term, and Tenant shall quit and surrender the premises to Landlord, but Tenant shall nevertheless continue to remain liable hereunder. Landlord may immediately or at any time thereafter re-enter the premises and remove all person and all or any property therefrom by any suitable action or proceedings at law or in equity, or by force or otherwise without being liable for any prosecution therefor or damages therefrom, and repossess and enjoy the premises as Landlord may see fit, and/or at any time relet the premises in whole or in part, as the agent of Tenant, or otherwise, in the name of Landlord or of Tenant, as Landlord shall see fit, and Landlord may receive the rents therefor, applying the same first to the payment of such reasonable expenses as landlord may have incurred in entering, dispossessing, reletting, repairing or altering the premises and then to the fulfillment of the covenants of Tenant herein, including but not limited to, the rental payments required hereunder, retaining any balances until the date the term of this lease would otherwise have expired as security for the payment of all obligations of Tenant which may arise and be unpaid during such period. If Landlord, after such re-entry, shall be unable to obtain sufficient rent from the premises to pay the amount of expenses hereinabove specified in addition to the payment of the rent required hereunder, and fulfillment of the covenants of Tenant herein, Tenant shall pay to Landlord such difference at the end of each month during the remainder of the term. In attempting to relet the premises, Landlord shall be the sole judge as to whether or not a proposed tenant is suitable and acceptable. Landlord shall not, by receiving partial payments of rent in arrears, be deemed to have waived any rights herein for non-payment of rent, or for any other default on the part of Tenant. In addition to all of the remedies granted Landlord in this respect, Landlord shall also have the right to invoke any remedy allowed at law or equity to enforce Landlord's rights hereunder or any of them, as if re-entry and other remedies were not herein provided for. At its sole option, in the event of any default as aforesaid, Landlord may accelerate and demand due all rental amounts due under the remaining term of the lease, adjusted to present value at the time of such acceleration.

No remedy herein conferred upon or reserved to Landlord is intended to be exclusive of any other available remedy or remedies, but each and every such remedy shall be cumulative, and shall be in addition to every other remedy given under this agreement or now or hereafter existing at law or in equity or by statute. No delay or omission by Landlord to exercise any right or power accruing upon any default of Tenant shall impair any such right or power accruing upon any default of Tenant shall impair any such right or power or shall be construed to be a waiver thereof, but any such right and power may be exercised by Landlord at any time, from time to time and as often as may be deemed expedient. In order to entitle Landlord to exercise any remedy reserved to it hereunder, it shall not be necessary to give any notice, other than such notice as is expressly required by this agreement.

In the event that either party shall be required to engage legal counsel for the enforcement of any of the terms of this Lease, whether such employment shall require institution of suit or other legal service required to secure compliance on the part of the defaulting party, the defaulting party shall be responsible for and shall promptly pay to the non-defaulting party the reasonable value of said attorneys' fees, and any other expenses incurred by the non-defaulting party as a result of such default.

16. Condemnation: If a portion of the demised premises shall be taken, as herein provided, for public improvements or otherwise, under the exercise of the right of eminent domain and the premises shall continue to be reasonably suitable for the use which is herein authorized, then the rental herein provided shall be reduced from the date of such taking in direct proportion to the reduction in usefulness of the premises.

If the real estate hereby leased, or a part thereof sufficient to render the demised premises substantially unfit for the use herein authorized, shall be condemned or acquired by grant or otherwise, for the widening of streets or for other public improvements, or shall otherwise be taken in the exercise of the right of eminent domain, Tenant shall have the right, at Tenant's option, to terminate and cancel this Lease on thirty (30) days prior written notice to Landlord, such notice to be given within sixty (60) days of the date of the taking and Tenant shall be liable only for rents and other charges accrued and earned to the date of surrender of possession of the premises to Landlord and for the performance of other obligations maturing prior to said date.

Tenant shall not be entitled to participate in or receive any part of the damages or award which may be paid to or awarded Landlord by reason of taking except where said award shall provide for moving or other reimbursable expenses for the tenant under

applicable statute.

17. Landlord's Right of Entry: Landlord reserves the right at all reasonable times during the term of this Lease for Landlord or Landlord's agents to enter the premises for the purposes of inspection and examining the same, and to show the same to prospective purchasers or tenants, and to make such repairs, alterations, improvements or additions as Landlord may deem necessary or desirable. During the ninety (90) days prior to the expiration of the term of this Lease or any renewal term, Landlord may exhibit the premises to prospective tenants or purchasers, and place upon the premises the usual notices advertising the premises for sale or lease, as the case may be, which notices Tenant shall permit to remain thereon without molestation.

18. Quiet Enjoyment: Landlord agrees that, if the rent is being paid in the manner and at the time prescribed and the covenants and obligations of the Tenant are being all and singularly kept, fulfilled and performed, Tenant shall lawfully and peaceably have, hold, possess, use, occupy and enjoy the premises as long as this Lease remains in force, without hindrance, disturbance or molestation from Landlord, subject to the specific provisions of this Lease.

19. Subordination: Tenant hereby subordinates all of its right, title and interest in and under this Lease to the lien of any mortgage or mortgages, or the lien resulting from any other method of financing or refinancing, now or hereafter in force against the real estate and/or buildings of which the demised premises are a part or against any buildings hereafter placed upon said real estate of which the demised premises are a part.

20. Notices: All notice required or permitted by the terms of this lease must be given by United States registered or certified mail addressed to:

Tenant at: Chestnut Hill Tree Farm LLC. 422 SW 140th Terr. Newberry, FL 32669	Landlord at: Equilease of Gainesville, Inc. 3501 SW 2nd Ave. Suite 2400 Newberry, FL. 32607

The date when such notice shall be deemed to have been given shall be the date when it is deposited in the United States mail, postage prepaid, in accordance with the provisions of this paragraph. Any address herein specified may be changed from time to time by either party by written notice given to the other party as above provided.

21. Successors: The provisions, covenants and conditions of this Lease shall bind an inure to the benefit of the legal representatives, successors and assigns of each of the parties, except that no assignment or subletting by Tenant without the written consent of Landlord shall vest any right in the assignee or sublessee of Tenant.

22. Governing Law: The Lease shall be governed by, and construed in accordance with, the laws of the State of Florida.

23. Landlord's Lien: N/A

24. Landlord's Exculpatory Clause: It is specifically understood and agreed that there shall be no personal liability of landlord in respect to any of the covenants, conditions, or provisions of this lease. In the event of a breach or default by Landlord of any of its obligations under this lease, Tenant shall look solely to any right of offset allowed by law against any amounts due hereunder or to the equity of the Landlord in the Property for the satisfaction of Tenant's remedies, it being understood and agreed that the exculpation of Landlord (and its successors and assigns) shall be absolute.

25. Entire and Binding Agreement: This Lease Agreement contains all of the agreements between the parties hereto, and it may not be modified in any manner other than by agreement signed by all parties hereto or their successors in interest.

26. Addenda: All addenda attached hereto are made a part of this Lease for all purposes.

27. Documentation: Tenant does covenant and agree to execute and deliver to the Landlord within ten (10) days from date of request such supplemental document, including financial statements, and estoppel certificates in reasonable form, as may be requested by Landlord. Any such documents may be relied upon by any prospective purchaser or prospective tenant of the premises, or any lender or prospective lender of the Landlord, or any assignee or prospective assignee of any lender thereof. If Tenant fails or refuses to furnish such certificate within the time provided, it will be conclusively presumed that this lease is in full force and effect in accordance with its terms and the Landlord is not in default.

29. Re-execution; Acknowledgment: The Tenant and any guarantor, if any, agree that they will, on request of Landlord, re-execute this Lease if necessary to observe any legal formalities (e.g., acknowledgment) required under the laws of the state where the premises are located.

30. Late Payments: If Tenant fails to pay, when due, any sum payable hereunder, interest will accrue from the date such payment is due at the annual interest rate generally announced by Chase Manhattan Bank, N.A. as its prime rate for ninety (90) day unsecured loans plus two (2%) percent, and such interest together with a late charge of five cents ($0.05) per each dollar so overdue to cover the extra expense involved in handling such delinquency (not as a penalty) shall be paid by Tenant to Landlord at the time of payment of the delinquent sum. Acceptance of a partial payment shall in no way be construed as an accord and satisfaction, nor will it waive any other of the landlords rights to full payment , and or actions toward delinquent payments.

31. Provisions Severable: If any term or provision of this lease or the application thereof to any person or circumstance shall, to any extent, be invalid or unenforceable, the remainder of this lease, or the application of such term or provision to persons or circumstances other than those as to which it is held invalid or unenforceable, shall not be affected thereby and each term and provision of this lease shall be valid and be enforced to the fullest extent permitted by law.

32. Security Deposit: Landlord may deposit the Security Deposit before final acceptance of this Lease. In the event of Landlord's unacceptance, Landlord shall refund the Deposit.

33. Lender's Approval: N/A, Property is currently owned free and clear

35. Radon Gas: Radon Gas is a naturally occurring radioactive gas that, when it has accumulated in a building in sufficient quantities, may present health risks to persons who are exposed to it over time. Levels of radon that exceed federal and state guidelines have been found in buildings in Florida. Additional information regarding radon and radon testing may be obtained from your county public health unit.

IN WITNESS WHEREOF, the parties hereto have executed this Lease as of the day and date first above written. Signed, sealed and delivered in the presence of :

Witness:

LANDLORD: Equilease of Gainesville, Inc.

By:

Its _____

TENANT:

Witness:

By: _____
Robert Wallace

Its _____

RENT ADDENDUM (FIXED ESCALATION)

The monthly rental payable (including CAM estimates) by Tenant hereunder shall be as follows:

Lease Month	Lease Amount	CAM's	Sales Tax	Total Due Monthly
1-12	$5,269.30	$1,718.25	$419.25	$7,406.80
13-36	Using 2015 as the base year, adjust as per cost of living adjustment schedule attached herein.			

CAMs for lease months 1-12 will be fixed at $2.25 per square foot per year, lease months 13-36 will be adjusted based on actual center CAM costs

Together with the payment of rent, Tenant shall pay any rental tax, gross receipts tax, or any charge imposed upon Landlord with respect to the receipt of collection of rent. All rent shall be paid in advance on the first (1st) day of each month at the address specified for notices to Landlord, such rent to be paid without demand.

	Landlord	Tenant
Initials		

SECURITY DEPOSIT ADDENDUM

As security for the prompt and punctual performance of all obligations required to be performed hereunder by Tenant, the Tenant shall deposit with the Landlord the sum of $2,500.00 which shall, as provided below, either be applied to rent or held as a security deposit until the expiration of the term. In the event of any default hereunder by Tenant, Landlord may utilize such deposit to offset either in whole or in part any obligations of the Tenant hereunder. The covenants in this Security Deposit Addendum are personal covenants between Landlord and Tenant and are not covenants running with the land, and in no event will Landlord's mortgagee or any purchaser at a foreclosure sale or a sale in lieu of foreclosure be liable to the Tenant for the return of the security deposit. Tenant shall not assign or encumber the security deposit or its interest therein, and neither Landlord nor its successors and assigns shall be bound by any attempted assignment or encumbrance.

Check which is applicable

Applied to first and last months rent ( )

Held as security until expiration of term (X)

Total amount due at the time of lease signing is as follows:

First Months Rent	$7,406.80
Security deposit:	$2,500.00
Total:	$9,906.80

	Landlord	Tenant
Initials		

SIGN ADDENDUM

1. All signs must be submitted in shop drawing form to the Landlord for approval as to type, size, color and design prior to fabrication. Approval shall not be unreasonably withheld for any such sign. Any sign being installed without approval and not meeting with the criteria of the center will be removed and brought into compliance at the expense of the Tenant. Tenant further agrees to maintain such sign, keep in good condition, repair at all times and will remove The same at the end of the term if requested by the Landlord to do so. Upon removal thereof, tenant agrees to repair any damage to the premises caused by such installation.

2. If governmental approval is required, this is the responsibility of the tenant.

3. Signs shall be individual letters. Construction shall be metal channel with plastic face. Each letter shall be internally lighted.

4. No sign shall cover more than 75% of the store front width and must be centered over Tenant's premises or in a place designated by Landlord. Maximum height of letters shall be 36".

5. No sign is to extend above the top of the facia or be more than 75% of the height of the facia.

6. Specific colors permitted will be red, black, blue, yellow, orange, green, white.

7. Specific letter style will be Helvetica Letters.

8. No raceway signs, box signs, uncovered neon signs, exterior free standing signs, or any signs other than those specifically approved by Landlord will be permitted.

	Landlord	Tenant
Initials		

Location: 422 SW 140th Terr.

Is Leased in as-is condition.

All work, fixtures, equipment, labor, material, permits, etc. shall be supplied and provided by Tenant at their expense.

	Landlord	Tenant
Initials		

COST OF LIVING ADJUSTMENT OF RENT

a) The minimum annual rent during the second year of the lease term and each year thereafter during the term shall be determined by calculating the product obtained by multiplying current rent by a fraction the numerator of which is the "Consumer Price Index-Seasonally Adjusted U.S. City Average for all Items For All Urban Consumers (1982-1984=100" published monthly in the "Monthly Labor Review" of the Bureau of Labor Statistics of the United States Department of Labor ("CPI-U) for the third month prior to the end of the immediately preceding lease year and the denominator of which is the CPI-U for the third month prior to the beginning of the immediately preceding lease year. A lease year is defined as the twelve month period that commences on the anniversary date of the first day of the first whole month of the lease term.

b. Notwithstanding the provisions of paragraph (a) above, in no event shall the Annual Minimum Rent payable for any Lease Year be less than the Annual Minimum Rent paid for the previous year.

c. In the event the CPI-U is discontinued, the "Consumer Price Index-Seasonally Adjusted U.S. City Average for All Items for Urban Wage Earners and Clerical Workers (1982-1984=100)" published monthly in the Labor Review by the Bureau of Labor Statistics of the United States Department of Labor ("CPI-W") shall be used for making the computation in paragraph (a) above. In the event CPI-W is discontinued, comparable statistics on the purchasing power of the consumer dollar published by the Bureau of Labor Statistics of the United States Department of Labor shall be used for making the computation in paragraph (a) above. In the event the Bureau of Labor Statistics shall no longer maintain comparable statistics published by a responsible financial periodical or recognized authority selected by Landlord shall be used for making the computation in paragraph (a) above.

In the event the base year "(1982-1984=100)" or other base year used in computing the CPI-U is changed, the figures used in making the adjustment in paragraph (a) above shall accordingly be changed so that all increases in the CPI-U are taken into account notwithstanding any such change in the base year.

	Landlord	Tenant
Initials		

OPTION TERM AGREEMENT

If the Tenant has complied with all of the Terms and Provisions of this Lease, and is not in default in any respect hereunder, the Tenant shall have (the "Option") to lease the premises after the termination of the Base Term for One (1) additional Three (3) year period under the same terms and conditions set forth herein except as may be otherwise provided hereunder as applicable to the option term. The Tenant shall exercise the Option by giving notice to Landlord in writing by certified mail, return receipt requested, not less than One Hundred and Twenty (120) days before the expiration of the Base Term.

Landlord Tenant

Guarantors Addendum

This document shall be considered an agreement between Equilease of Gainesville, Inc. and Robert Wallace. It is to be made a part of The Lease agreement originally signed between the aforementioned parties on this 24th day of June, 2015.

This Guarantee is made pursuant to, and is attached to and made a part of, that certain Lease Agreement (the "Lease" or "Lease Agreement" wherein the Landlord is Equilease of Gainesville, Inc. and the Tenant is Chestnut Hill Tree Farm LLC., which Lease Agreement is dated June 24th, 2015.

NOW, THEREFORE, in consideration of the Landlord having entered into the Lease Agreement with the Tenant, and Acknowledging that the execution of this guaranty is a material inducement for the Landlord to have done so, the undersigned Guarantors, herein intending to be legally bound, jointly and severally agree as follows:

1. Guarantor hereby guarantees to Landlord the full and prompt payment of all rent and additional rent and any and all other sums and charges payable by Tenant, under the Lease, and the full, faithful and prompt performance and observance of all the covenants, terms, conditions and agreements therein provided to be performed and observed by Tenant and Guarantor does hereby become surety to Landlord, for and with respect to all of the aforesaid obligations of Tenant under the Lease. Guarantor hereby covenants and agrees to and with Landlord that if default shall at any time be made by Tenant in the payment of any of the covenants, terms, conditions or agreements contained in the lease, Guarantor will forthwith pay such rent or other sums or charges to Landlord and any arrears thereof, and will forthwith faithfully perform and fulfill all of such covenants, terms, conditions and agreements, and will forthwith pay to Landlord all damages and all costs and expenses that may arise in consequence of any default by Tenant under the Lease, provided, however that Guarantor shall be given written notice by landlord certified mail, return receipt requested, of Tenant's default; and provided further that if any such default shall be cured within twenty (20) days after Guarantor receives said notice, default shall be declared.

2. This Guaranty is an absolute and unconditional guaranty of payment and of performance and is a surety agreement. Guarantors liability hereunder is direct and may be enforced without Landlord being required to resort to any other right, remedy, or security, and this guaranty shall be enforceable, jointly and severally against any of the individual undersigned Guarantors, without the necessity for any suit or proceedings on Landlord's part of any kind or nature whatsoever against Tenant, and without the necessity of any notice of acceptance of this Guaranty or of Landlord's intention to act in reliance hereon, all of which Guarantor hereby expressly waives.

3. Guarantor hereby expressly agrees that the validity of this Guaranty and the obligations of the Guarantor hereunder shall not be terminated, affected or

IN WITNESS WHEREOF, Guarantors, intending to be legally bound hereby, has caused this Guaranty to be executed on this 24th day of June.

Guarantors:

Robert Wallace

Witnesses:

impaired by reason of the assertion of the failure of Landlord to assert against Tenant any of the rights or remedies reserved to Landlord under the provisions of this Lease.

4. This Guaranty shall be a continuing Guaranty, and the liability and obligation of Guarantor hereunder shall be absolute and unconditional and shall remain in full force and effect without regard to, and shall not be released, discharged or in any way impaired by (a) any amendment or modification of, or supplement to, or extension or renewal of, the lease or any assignment or transfer thereof; (b) any exercise or non-exercise of any right, power, remedy or privilege under or in respect to any of the covenants, terms, conditions or agreements contained in the lease or any indulgences, forbearance or extensions of time for performance or observance allowed to Tenant from time to time and for any length of time; (c) any bankruptcy, insolvency, reorganization, arrangement, readjustment, composition, liquidation or similar proceeding relating to Tenant or its properties or creditors; (d) any limitation on the liability or obligations of Tenant under the Lease or its estate in bankruptcy or of any remedy for the enforcement thereof, resulting from the operation of any present or future provision of the National Bankruptcy Act or any other statute or from the decision of any other court: or (e) any transfer by Tenant or any assignment of its interest under the Lease.

5. All of Landlords rights and remedies under the Lease and under the Guaranty are intended to be distinct, separate and cumulative and no such right or remedy therein or herein mentioned is intended to be exclusive of or a waiver of any of the others.

6. No termination of the Lease or taking or recovering of the premises demised thereby shall deprive Landlord of any of its rights and remedies against guarantor under this guaranty.

7. This Guaranty shall apply to Tenant's obligations pursuant to any extension, renewal, amendment, modification and supplement of or to the Lease as well as to Tenant's obligations thereunder during the original term thereof in accordance with the original provisions thereof.

8. The use of any gender shall include all genders. All reference to Landlord, Tenant and Guarantor shall include their respective heirs, executors, administrators, successors and assigns.

9. This Guaranty may be changed, waiver, modified or terminated only by an instrument in writing signed by the Guarantor and the Landlord.

GatewayBank

THE *New* OLD-FASHIONED BANK

June 3, 2015

Re: 1310 SW 13th Street
Gainesville, Florida 32608

To Whom It May Concern:

Gateway Bank of Central Florida currently holds the mortgage on the above referenced property in the name of Ponce Inlet Development, LLC. Please consider this my approval for Mr. Robert Wallace to put a medical marijuana dispensary in 1,200 square feet of the subject property. This approval assumes that said usage meets all city, county, state and federal regulations and is otherwise considered legal.

If you have any questions please feel free to call me at 352 416-0331.

Sincerely,

Danny L. Gilliland
Market President

FDIC

4100 N.W. 37th Place • Gainesville, FL 32606 • PHONE: 352-416-0330 • FAX: 352-336-1793
www.gatewaybankcfl.com

LEASE AGREEMENT

THIS LEASE made this 15th day of June 2015, by and between **PONCE INLET DEVELOPMENT LLC**, a Florida limited liability company, referred to as "Lessor," and **Chestnut Hill Tree Farm LLC** referred to as "Lessee." In consideration of the mutual covenants set forth herein, and for other good and valuable consideration, the receipt and sufficiency of which are hereby acknowledged, the parties agree as follows:

1.0 Demised Demised Premises

1.1 Lessor leases to Lessee, and Lessee leases from Lessor, approximately One Thousand Two Hundred Seventy Four (1,274 +/-) square feet of floor area (hereinafter "demised Demised Premises") in the commercial development that Lessor has constructed in a mixed-use building (hereinafter "Demised Premises") located at 1310 SW 13th Street, Gainesville, Alachua County, Florida 32601. The Demised Premises also is known as "Unit 4" of the mixed-use building, and Lessee intends to use Unit 4 for medical office business purposes in this Agreement.

2.0 Lease Term

2.1 Initial Term. The "Commencement Date" of this Lease is the date of Occupancy, which is to be determined but anticipated to be no later than September 1, 2015. The Initial Term will extend for five (5) years after the Commencement Date. The "Rent Commencement Date" is the date Lessee opens the Demised Premises for business to the public, which shall be determined at the time that the date of Occupancy is set. A letter acknowledging and confirming the Commencement Date and Rent Commencement Date shall be signed by both parties immediately after Lessee occupies the Demised Premises and, upon full execution, shall be made part of this Lease. This Lease Agreement will become effective on the date all parties intending to be bound have executed it. In the event this Agreement remains unexecuted as of 15 September 2015 the Agreement shall be deemed terminated and the parties will have no further rights or obligations as to each other.

2.2 Lease Extension(s). If Lessee has complied with all the terms and provisions of this Lease, and is not in default, then Lessee shall have the option to renew this Lease Agreement for three (3) additional five (5) year periods (each, a "Lease Extension") under the same terms and conditions as the Initial Term except as may otherwise be provided in this Agreement. The Lessee shall exercise its option by giving notice to Lessor in writing not less than one hundred and eighty (180) days before the expiration of the Initial Term and before the expiration of each Lease Extension, as applicable.

3.0 Rent

3.1 Minimum Rent: Lessee shall pay to the Lessor as minimum rent the amounts specified in the Rent Addendum attached hereto and made a part hereof.

3.2 Lease Year starts on the Rent Commencement Date and terminates on the last day of the twelfth (12th) full calendar month following the Rent Commencement Date. The first Lease Year shall include the partial month, if any, if the Rent Commencement Date does not fall on the first day of a calendar month. Thereafter, each Lease Year is a period of

twelve (12) full calendar months that starts on the last day of the immediately preceding Lease Year.

3.3 Pro-Rata Share of Real Estate Taxes, Insurance Premiums and Common Area Maintenance Expenses: (Collectively hereafter referred to as " C.A.Ms") Lessee shall remit to the Lessor as additional rent its Pro-Rata Share, as hereinafter defined, multiplied by the real estate taxes, insurance premiums, and common area maintenance expenses incurred by the Lessor in connection with the operation of the Retail Center. Lessee's Pro-Rata Share shall be a fraction, the numerator of which shall be the number of square feet (1,274) in the Demised Premises and the denominator of which shall be the total number of square feet (13,815) in the Retail Center for which the Lessor is obligated to make payment, the Sublesse acknowledging and agreeing that the area leased by other Lessees may be separately assessed for tax purposes, or such other Lessees may obtain their own insurance or maintain their own common areas. Lessee shall pay its Pro-Rata Share of the above expenses within twenty (20) days after receipt of a bill therefor.

3.4 Real Estate Taxes. The term "real estate taxes" shall mean all taxes and assessments (special or otherwise) levied or assessed against the Retail Center (land, buildings and improvements), and other taxes arising out of the use and/or occupancy of the Demised Premises imposed by any federal, state or local governmental authority or any other taxing authority having jurisdiction over the Retail Center (including expenses directly incurred by Lessor in contesting the validity of, in seeking a reduction in, or seeking to prevent an increase in any such tax(es) or assessment(s), but shall exclude franchise capital stock estate or inheritance taxes personal in nature to Lessor).

3.5 Additional Taxes.In addition to Lessee's proportionate share of real estate taxes, Lessee shall pay any and all sales, excise receipts and other taxes (not including, however, Lessor's income taxes) levied, imposed or assessed by the state in which the Retail Center is situate or any political subdivision thereof or other taxing authority (be it federal, state, local or otherwise) upon any amounts payable hereunder.

3.6 Insurance Premiums. The term "insurance premiums" shall mean the premiums charged for fire and extended coverage insurance on the improvements constructed and/or installed by the Lessor in the center and for rent insurance thereon, together with premiums charged for liability insurance on the common areas in the Retail Center, and any other reasonable insurance costs incurred in the normal course of business.

3.7 Common Area Maintenance.The term "common area maintenance expenses" shall mean the total cost and expense incurred in operation, maintaining, cleaning and repairing the common areas including, without limitation, landscaping and gardening, maintenance, repair and replacement of parking lot, line painting, lighting, traffic control, if any, sanitary control, the cost of personnel to implement such services and to direct parking and to police the common areas, music or other communication systems for the Retail Center, depreciation of heating, ventilating and air conditioning equipment for the common areas and the Retail Center roof and a reasonable sum to cover the administrative costs relative to the operation of the said common areas.

3.8 Estimation of Taxes, Insurance and Common Area Maintenance Charges: Lessor may,

Initials

Lessor Lessee

at its option, estimate for each succeeding calendar year the Lessee's pro-rata share of the expenses enumerated in Paragraph 4 hereof (the "Lessee's Estimated Share"). Lessor may require the Lessee to pay, with each monthly installment of rent for such succeeding calendar year, one-twelfth (1/12) of the Lessee's Estimated Share. Within sixty (60) days after the expiration of such calendar year, the Lessor shall forward to the Lessee an itemized statement showing the Lessee's actual share of such expenses ("Lessee's Actual Share"). Should the Lessee's Actual Share differ from the Lessee's Estimated Share, then, within (30) days after the date of Lessor's itemized statement, either Lessor shall refund to Lessee any amount paid in excess of the Lessee's Actual Share, or Lessee shall remit to Lessor any amounts by which the Lessee's Estimated Share was deficient. First year's estimate will be fixed at $1.50 per square foot or $159.25 per month.

3.9 Late Payments. If Lessee fails to pay, when due, any sum payable hereunder, interest will accrue from the date such payment is due at the annual interest rate generally announced by Chase Manhattan Bank, N.A. as its prime rate for ninety (90) day unsecured loans plus two percent (2%), and such interest together with a late charge of five cents ($0.05) per each dollar so overdue to cover the extra expense involved in handling such delinquency (not as a penalty) shall be paid by Lessee to Lessor at the time of payment of the delinquent sum.

4.0 PARKING AND COMMON AREAS

4.1 Parking for Patrons. Lessee may use Lessor's parking area when available for the benefit of Lessee's patrons on the grounds of the mixed-use building between the hours of 3:30pm and 7:00 am during the Initial Term of this Lease and subsequent Lease extensions. Such parking is on a first-come, first-served basis and is shared with other lessees of the mixed-use building.

4.2 Parking for Employees and Management. Lessee will instruct its employees to park only in the parking areas designated for this purpose by Lessor from time to time ("Employee Parking"). The Employee Parking may or may not be part of the mixed-use building, and may be on adjoining property or nearby within walking distance (measured as a 10-minute walk). No commercial vehicles, storage trailers or other similar vehicles may be parked on the Demised Premises. No vehicles may be parked overnight on the Demised Premises without express written approval of Lessor. Notwithstanding the foregoing, Lessor shall provide two (2) reserved parking spaces for Lessee's management at the south end of the first floor of the parking structure in the mixed-use building. Additional parking passes may be purchased from Lessor.

4.3 Lessee's Rights to Use Common Area, Ingress and Egress. Lessee also shall have the nonexclusive right of ingress and egress, and use of elevators and lobby areas of the parking garage. Lessee's operations within the Exclusive Area shall include but not be limited to: loading and unloading of delivery vehicles; service bay access; trash disposal and dumpster access.

4.4 Compliance with Common Area Rules. Lessee shall comply and cause its employees and agents to comply with all rules and regulations adopted by Lessor or Lessor in connection with the use of the mixed use building's parking and common areas, including all supplements and amendments which Lessor or Lessor may in the future adopt so long as such rules and regulations are amended to incorporate Lessee's exclusive rights under this Agreement, and that a written copy of all adopted rules, regulations, amendments and supplements is delivered to Lessee in advance of any expected compliance.

5.0 SIGNAGE

5.1 All of Lessee's signs shall comply with applicable ordinances or other governmental restrictions and the determination of such requirements and prompt compliance therewith shall be the responsibility of Lessee. All signs of Lessee visible from the common areas shall conform to the design standards established from time to time by Lessor and/or Lessor for the Demised Premises, except that Lessee's trade marks and logos are deemed acceptable for Lessee's signage.

6.0 USE OF DEMISED PREMISES

6.1 Authorized Use. Lessee shall use the demised Demised Premises solely for operating a Dispensary for Medical Marijuana. No part of the demised Demised Premises shall be used for any other purpose without the prior written consent of Lessor. Lessee shall comply with all rules, regulations and laws of any governmental authority with jurisdiction as to use and occupancy of the leased Demised Premises. Lessee shall abide by any exclusive or restrictive use rights granted by Lessor or Lessor to any other lessees of the mixed-use building, which exclusive or restrictive use provisions are available for Lessee inspection.

6.2 Hours of Operation. Lessee shall keep its business in the Demised Premises open continuously during the term of this Lease, except Lessee shall not be required to remain open for business on weekends, holidays, and other times that are deemed non-business hours by the Lessee, and shall not be restricted to particular hours and days of operation.

6.3 Prohibited Activities. Lessee shall not conduct or permit any fire, bankruptcy, auction or "going out of business sale" (whether real or fictitious) on the Demised Premises, and shall not use any portion of the Demised Premises to generate, manufacture, refine, transport, treat, store, handle or dispose of hazardous substances; hazardous substances are those regulated under the federal Resource Conservation and Recovery Act. Lessee shall not suffer, allow or permit any nuisance level of vibration, noise, light, odor or other such effect to emanate from the Demised Premises. Lessee shall not use or occupy the Demised Premises in a manner that prevents Lessor from obtaining insurances at standard rates. Lessee shall not use the Demised Premises for any of the following: No part of the Leased Property shall be used for any of the following purposes: (i) theater of any kind; (ii) skating rink; (iii) bowling alley; (iv) billiard or bingo parlor; (v) carnival, amusement park or circus; (vi) facility for the sale, lease and/or repair of new or used motor vehicles, trailers or mobile homes; (vii) any use which involves the raising, breeding or keeping of any animals or poultry; (viii) any industrial uses, including, without limitation, any manufacturing, smelting, rendering, brewing, refining, chemical manufacturing or processing, or other manufacturing uses; (ix) any mining or mineral exploration or development; (x) any facility for the sale of paraphernalia for use with illicit drugs; (xi) any adult book store, massage parlor, adult nightclub or dance venue, adult theatre, adult amusement facility, and any similar facility selling or displaying pornographic materials or having such displays; (xii) gasoline service station; (xiii) liquor store or discount alcoholic beverage shop; (xiv) tobacco store; (xv) bar, lounge or night club; xvi) pawn shop; (xvii) second-hand merchandise or thrift shop; (xviii) gun shop or facility offering target

Initials

Lessor Lessee

practice; (xix) waste disposal, salvage or recycling facility; (xx) sewage treatment plant; and (xxi) any use that would violate any applicable governmental regulations. The above list is not intended to be exhaustive and there may be other similar prohibited uses which would not be suitable for Lessor's healthcare campus. Notwithstanding the above, restaurants, including restaurants that serve alcohol, so long as alcoholic beverages account for less that a majority of sales, are not prohibited.

6.4 Excepted Activities. As described herein, Lessee shall have the right to utilize the Common Area and Exclusive Area, including but not limited to, the parking garage, service bay and dumpsters. Lessee shall not impede pedestrian traffic in the Common Area or in front of Demised Premises.

7.0 INSTALLATION AND MAINTENANCE OF FIXTURES

7.1 Lessor shall turn over to Lessee the demised Demised Premises in a condition ready and suitable for Lessee's construction of leasehold improvements and installation of trade fixtures according to the Scope of Work (which will include required completion dates) and approved Plans and Specifications that have been jointly reviewed and approved by Lessor and Lessee and conceptually approved by Lessor. Lessee, prior to Lessor's approval and commencement of work by Lessor, shall satisfy Lessor and Lessor's Lender that the funds necessary to complete Lessee's portion of the construction are available and secure.

7.2 Pursuant to the approved Scope of Work and Plans and Specifications and provided Lessor has timely turned over the Demised Premises for Lessee's construction work, Lessee shall, no later than the Commencement Date, purchase and install in the demised Demised Premises all trade fixtures, lighting fixtures, floor coverings, equipment, and furnishings (hereafter "materials and equipment") which are necessary or proper for the operation of Lessee's business. All such materials and equipment shall be of good quality and commensurate in appearance with the demised Demised Premises. Lessee shall maintain the same in good condition at its own cost and expense during the term of this lease.

8.0 LIABILITY

8.1 Except to the extent permitted by law and/or this agreement, Lessor shall not be liable to Lessee for any damage or injury to Lessee or Lessee's property occasioned by any defect of plumbing, heating, air cooling, air conditioning equipment and ducts, electric wiring or insulation, gas pipes, steam pipes, or from broken steps, or from the backing up of any sewer pipe, or from the bursting, leaking, or running of any tank, tub, washstand, water closet, waste pipe, drain, or any other pipe or tank in, on, or about the demised Demised Premises, or from the escape of steam or hot water from any boiler or radiator, on or coming through the roof, stairs, walks, or any other place on or near the demised Demised Premises unless Lessor neglects or fails to make the necessary repairs required of it to be made under the terms of this Lease Agreement after reasonable notice.

9.0 REPAIRS

9.1 Lessor's Duty to Repair. Lessor shall conduct all routine inspections necessary and make all repairs and replacements necessary to maintain the roof and roof systems, foundation, exterior walls, all structural portions of the building, parking areas, sidewalks, landscaped areas, drainage systems, common areas, and those utility systems serving the multi-user building or portions thereof as a whole and not particular to Lessee's Demised

Premises. Lessor shall not be called upon to make any other improvements or repairs of any kind upon the Demised Premises and appurtenances, and shall not be responsible for repairs required by the acts or omissions of Lessee.

9.2 Lessee's Duty to Repair; Alterations. Except for the repairs required to be performed by Lessor in Paragraph 9.1, Lessee shall keep and maintain in good order, condition and repair the interior of the Demised Premises and every part thereof and any and all appurtenances thereto, including but not limited to: the interior walls, floors and ceiling, meters solely applicable to Lessee's Demised Premises, and all permitted alterations made by Lessee under the terms of this Lease.

9.3 Indemnity. Lessee shall save Lessor harmless from claims for mechanics, materialmen's or other liens in connection with any work by Lessee, and any such liens shall exist only against Lessee's leasehold interest and shall be discharged, by bond or otherwise, within thirty (30) days after recording.

10.0 UTILITIES

10.1 Utilities. Lessee shall pay promptly, when due and payable, all rates and charges for water, sewer, electricity, gas, heat, steam, hot and/or chilled water, air conditioning, ventilating, lighting systems, sprinkler systems, and other similar charges incurred by Lessee with respect to and during its occupancy of the Demised Premises.

11.0 INSURANCE

11.1 Liability and Property Damage. Lessee shall, at its own expense, during the term of this lease, maintain and keep in force a policy or policies of insurance, written by one or more responsible insurance carriers, acceptable to Lessor, which shall insure Lessee against liability for injury to or death of persons or loss or damage to their property occurring in or about the Demised Premises. The liability coverage shall be a minimum of One Million and 00/100 Dollars ($1,000,000.00) for any occurrence, Two Million and 00/100 Dollars ($2,000,000.00) in the aggregate, and Five Hundred Thousand and 00/100 Dollars ($500,000.00) for property damage. Lessee shall provide Lessor a certificate evidencing each such insurance policy promptly upon its inception or renewal. The policy shall contain a provision that it may not be canceled without first giving Lessor not less than thirty (30) days' advance notice, and names Lessor as additional insured.

11.2 Fire. Lessor shall maintain and keep in force a policy or policies of fire insurance covering the Demised Premises. Lessee agrees not to keep upon the Demised Premises any articles or goods that are prohibited by the standard form of fire insurance policy. In the event these insurance rates increase by sole reason of any use made by Lessee, then Lessee shall pay to Lessor any such resulting incremental increase. This insurance shall insure damage to improvements constructed and/or installed by Lessor only. Lessee shall be responsible for insuring its improvements, furniture, fixtures, and other personal property and any business losses.

Initials

Lessor Lessee

11.3 Workers Compensation. Lessee shall maintain and keep in force all workers' compensation insurance required under the laws of the State of Florida. Lessee shall provide Lessor a certificate evidencing compliance with this requirement.

11.4 Limitation of Lessee's Liability. Lessee agrees that if any property owned by it and located in, on or about the Demised Premises shall be damaged or destroyed by an insured peril, Lessor shall not have any liability to Lessee, nor to any insurer of Lessee, for or in respect to such damage or destruction.

11.5 Indemnity. Lessee shall protect, indemnify and save Lessor harmless from and against any and all liability and expense of any kind, including reasonable attorneys' fees, arising from injuries or damages to persons or property in, on or about the Demised Premises arising out of or resulting in any way from any act or omission of Lessee, its agents, invitees, contractors, servants and employees, in the construction and use of the Demised Premises during the term of this Lease. Lessor shall protect, indemnify and save Lessee harmless from and against any and all liability and expense of any kind, including reasonable attorneys' fees, arising from injuries or damages to persons or property in, on or about the Demised Premises arising out of or resulting in any way from any act or omission of Lessor, its agents, invitees, contractors, servants and employees.

12.0 DAMAGE OR DESTRUCTION BY FIRE OR OTHER CASUALTY

12.1 Generally. If at any time, the Demised Premises becomes totally unLesseeable by reason of damage or loss by fire or other casualty and such fire or other casualty shall not have been caused by the negligence, wrongful act or omission by Lessee, Lessee's servants, agents, licensees, or invitees, the rent shall abate until the Demised Premises shall have been restored by Lessor to leaseable condition, but nothing herein is to be construed as requiring Lessor to restore or rebuild the Demised Premises. If the Demised Premises are so damaged, but not to the extent that they are unleaseable, Lessee shall if practicable continue to occupy same or the leasable portion thereof, and the rent shall abate proportionately in the ratio that the unusable portion bears to the entire Demised Premises. In the event of a loss from fire or other casualty, Lessor shall have an election to not rebuild or recondition the Demised Premises, which election shall be exercised by written notice thereof to Lessee, given within thirty (30) days from the date of said loss. If Lessor exercises such election, this lease shall cease and terminate, effective on the date of such loss, or Lessor, if the rent has been paid beyond such date, shall refund to Lessee the proportionate part of any such rent prepaid, and thereupon this Lease shall become null and void, with no further obligation on the part of either party hereto, even though the building at a later date may be restored, rebuilt or reconditioned

12.2 Right to Insurance Proceeds. In the event the demised Demised Premises is damaged or destroyed by fire or other casualty so insured against, Lessee shall claim no interest in any insurance settlement arising out of any such loss where premiums are paid by Lessor, or where Lessor is named as the sole beneficiary, and that it shall sign any and all documents required by Lessor or the insurer to settle any such loss. Lessee shall look to its own insurer for coverage of its materials, equipment and leasehold improvements in the event of such loss or casualty.

13.0 TRANSFER OR PLEDGE OF LEASEHOLD INTEREST

13.1 Consent Required. Neither Lessee nor any court or officer thereof nor any receiver or trustee in bankruptcy shall assign or transfer this Lease or any part thereof, or interest

therein, or sublet the Demised Premises or any part thereof without Lessor's prior written consent. Lessor expressly agrees that such consent shall not be unreasonably or arbitrarily refused provided the proposed assignee, Lessee, licensee or mortgagee is financially qualified to assume the Lessee's obligations and responsibilities under this Lease. In the event such consent to assign or lease is granted, Lessee shall remain fully liable for the performance of all the terms, conditions, or covenants of this lease for the full term.

14.0 SURRENDER OF DEMISED PREMISES

14.1 Good Condition. Lessee shall, at the expiration or termination of this lease, vacate the demised Demised Premises in good condition, except for ordinary wear and tear. Lessee shall leave the demised Demised Premises free and clear of all rubbish and debris, and shall be entitled to remove all trade fixtures and equipment. During the last three (3) months of the term of this lease or any extension thereof, Lessor may display a reasonable "For Rent" sign on the exterior of the demised Demised Premises, and may show the demised Demised Premises to prospective Lessees so long as each showing does not interfere with Lessee's business and provides advance notice to Lessee.

15.0 LESSEE'S LEASEHOLD IMPROVEMENTS

15.1 Approval of Lessee's Improvements. Lessee will submit plans and specifications for Lessee's leasehold improvements to Lessor for approval, which approval shall not be withheld unreasonably. Upon the expiration or termination of this lease, all fixtures installed by Lessee, except for trade fixtures and equipment, shall become the property of Lessor unless otherwise agreed between the parties.

15.2 Construction of Leasehold improvements. Lessee and Lessor shall prior to Construction jointly approve Construction Plans and specifications and Scope of Work for Leasehold Improvements. Lessor shall provide space in "Vanilla Shell" condition, with plumbing, bathroom, HVAC, electrical service and demising walls established. Lessee agrees to pay for additional builout at their own expense, and such improvements will become fixtures as part of the Demised Premises. Lessor and Lessee shall jointly have the right to employ at their choice any and all contractors, sub-contractors or independent agents who will construct the improvements Lessor is responsible for under the Scope of Work. Lessee shall provide reasonable evidence that the Leasehold Improvements which are its responsibility will be constructed prior to occupancy. Also, Lessee shall either deposit the necessary funds to cover the cost of Lessee's improvements or provide evidence that these funds are available prior to construction.

15.3 Permitting. Lessor and Lessee shall obtain building permit(s) and complete construction of leasehold improvements by the Commencement Date, unless otherwise provided in this Agreement. The parties will advance their respective work diligently, in good faith and with deliberate speed. The parties will work amicably and cooperatively to the extent necessary to obtain all permits and approvals for the construction and leasehold improvements contemplated by this lease. All construction performed by the parties will comply with all applicable government rules, regulations, and Florida building codes. All construction will be performed by Florida-licensed construction professionals.

Initials

Lessor Lessee

15.4 Limitation of Lessor's Liability. The interest of Lessor in the real property subject to this Lease shall not be subject to liens for improvements made by Lessee. Lessee shall notify every contractor making improvements of this prohibition prior to executing a construction-related contract. Lessee agrees to pay all contractors, laborers, and materialmen promptly when payment is due to preclude the assertion of any claim of lien, mortgage, or encumbrance of any nature whatsoever against Lessor's property. Lessee further agrees to indemnify and save Lessor harmless against any and all costs, expenses, claims, or damages, including reasonable attorney's fees resulting from construction or alteration of the demised Demised Premises.

16.0 LESSOR'S RIGHT OF ENTRY

16.1 Lessor shall have access to the demised Demised Premises during Lessee's regular business hours, upon forty-eight (48) hours' advance notice, for the purpose of routine inspections, making repairs, and showing the Demised Premises to a prospective Lessee. In case of emergency, Successor may access the demised Demised Premises without advance notice.

17.0 REMEDIES FOR DEFAULT

17.1 Lessee shall be in default under this lease if any of the following occurs:

1) If rents or other charges under this Lease are not paid when due, and remain unpaid for a period of fifteen (15) days;
2) Failing to promptly perform any other condition or agreement for which Lessee is responsible, and not curing the failure within a period of fifteen (15) days after written notice specifying the nature of such failure;
3) Abandonment the demised Demised Premises; or
4) Breach of (and failure to cure) any of its obligations under this lease.

17.2 Lessor shall be in default under this lease if any of the following occurs:

1) Failing to timely deliver the demised Demised Premises for Lessee's construction of leasehold improvements;
2) Failing to timely repair or replace, or both, the roof and roof systems, foundation, exterior walls, all structural portions of the building, parking areas, sidewalks, landscaped areas, drainage systems, and those utility systems serving the multi-user building or portions thereof as a whole. However, should Lessor fail or refuse to carry out its obligations for repair of the above to Lessor, then Lessee may terminate this Lease.

17.3 In the event of an alleged default, Lessor and Lessee will attempt to resolve any such dispute amicably and in good faith. In the event the Demised Premises become deserted, or stand vacant, or if Lessee be in default, whether in the payment of rent or in the performance of any covenant, agreement, obligation, or condition herein contained, or in the event the Lessee shall become insolvent, or file a petition in voluntary bankruptcy, or have an involuntary petition in bankruptcy filed against it. Lessor may at Lessor's option and without notice to Lessee, which is hereby expressly waived, at any time declare this lease terminated and this lease shall expire as fully and completely as if that day were the date herein originally fixed for the expiration of the term, and Lessee shall quit and surrender the Demised Premises to Lessor, but Lessee shall nevertheless continue to remain liable hereunder. Lessor may immediately or at any time thereafter re-enter the Demised Premises and remove all person and all or any property therefrom by any suitable action or proceedings at law or in equity, or by force or otherwise without being liable for any

prosecution therefor or damages therefrom, and repossess and enjoy the Demised Premises as Lessor may see fit, and/or at any time relet the Demised Premises in whole or in part, as the agent of Lessee, or otherwise, in the name of Lessor or of Lessee, as Lessor shall see fit, and Lessor may receive the rents therefor, applying the same first to the payment of such reasonable expenses as Lessor may have incurred in entering, dispossessing, reletting, repairing or altering the Demised Premises and then to the fulfillment of the covenants of Lessee herein, including but not limited to, the rental payments required hereunder, retaining any balances until the date the term of this lease would otherwise have expired as security for the payment of all obligations of Lessee which may arise and be unpaid during such period. If Lessor, after such re-entry, shall be unable to obtain sufficient rent from the Demised Premises to pay the amount of expenses hereinabove specified in addition to the payment of the rent required hereunder, and fulfillment of the covenants of Lessee herein, Lessee shall pay to Lessor such difference at the end of each month during the remainder of the term. In attempting to relet the Demised Premises, Lessor shall be the sole judge as to whether or not a proposed Lessee is suitable and acceptable. Lessor shall not, by receiving partial payments of rent in arrears, be deemed to have waived any rights herein for non-payment of rent, or for any other default on the part of Lessee. In addition to all of the remedies granted Lessor in this respect, Lessor shall also have the right to invoke any remedy allowed at law or equity to enforce Lessor's rights hereunder or any of them, as if re-entry and other remedies were not herein provided for.

17.4 No remedy herein conferred upon or reserved to Lessor is intended to be exclusive of any other available remedy or remedies, but each and every such remedy shall be cumulative, and shall be in addition to every other remedy given under this agreement or now or hereafter existing at law or in equity or by statute. No delay or omission by Lessor to exercise any right or power accruing upon any default of Lessee shall impair any such right or power accruing upon any default of Lessee shall impair any such right or power or shall be construed to be a waiver thereof, but any such right and power may be exercised by Lessor at any time, from time to time and as often as may be deemed expedient. In order to entitle Lessor to exercise any remedy reserved to it hereunder, it shall not be necessary to give any notice, other than such notice as is expressly required by this agreement.

17.5 In the event that either party shall be required to engage legal counsel for the enforcement of any of the terms of this Lease, whether such employment shall require institution of suit or other legal service required to secure compliance on the part of the defaulting party, the defaulting party shall be responsible for and shall promptly pay to the non-defaulting party the reasonable value of said attorneys' fees, and any other expenses incurred by the non-defaulting party as a result of such default.

18.0 CONDEMNATION (EMINENT DOMAIN) AND TAKINGS

18.1 In the event thirty percent (30%) or more of the demised Demised Premises is condemned or taken for a public or quasipublic purpose, this lease shall terminate as of the date of the taking, and the parties shall be released from any and all further liability.

18.2 In the event of a partial taking of less than thirty percent (30%) of the demised Demised Premises, Lessor shall, with reasonable diligence, proceed at its own expense to

Initials

Lessor Lessee

reconstruct or repair the demised Demised Premises and place the same in a Lesseeable condition within one hundred twenty (120) days after the date of the taking.

18.3 During any reconstruction or repair work resulting from the above- described taking, Lessee shall be required to pay only the fixed minimum monthly rental (plus other amounts due under this lease) in proportion to the area of the demised Demised Premises remaining in a Lesseeable condition. On completion of such reconstruction or repairing, the fixed minimum monthly rental shall be adjusted in the proportion that the reconstructed demised Demised Premises bears to the original demised Demised Premises. Thereafter, Lessee shall be required to pay such adjusted fixed minimum monthly rental (plus other amounts due under this lease) in accordance with the provisions of this lease. There shall be no abatement of any rental or other amount due until such time as an order of condemnation is issued by the Court.

18.4 Any award made of the demised Demised Premises shall be the sole property of and be paid to Lessor. If the Demised Premises or the rights of Lessee under this Lease shall be affected in any way by any condemnation or conveyance in lieu thereof, Lessee waives all claims of any nature whatsoever against Lessor. Notwithstanding the foregoing, Lessee may file such claims with the condemning authority as may be permitted by applicable law for any expenses or damages allowed by law and as may be separately awarded and recoverable by Lessee.

19.0 WAIVER OF BREACH

19.1 No waiver by Lessor of any breach of any provision or condition of this lease shall be construed to be a waiver of any preceding or succeeding breach of such provision or condition or of any other provision or condition.

20.0 MORTGAGE LIENS

20.1 Lessee shall have the right from time-to-time to grant and assign a mortgage or other security interest in any or all of Lessee's personal property (i.e. equipment, inventory) located within the demised Demised Premises to its lenders. Lessor shall execute such documents as Lessee's lenders may reasonably request in connection with such financing arrangements, unless Lessee is in Default hereunder.

20.2 All trade fixtures, inventory, and other personal property owned by Lessee and installed in or located upon the demised Demised Premises shall remain the property of Lessee and shall be removable by Lessee from time-to-time and upon the expiration of this lease or any renewal period, unless Lessee is in Default hereunder.

21.0 QUIET ENJOYMENT

21.1 Lessor agrees that, if the rent is being paid in the manner and at the time prescribed and the covenants and obligations of the Lessee are being all and singularly kept, fulfilled and performed, Lessee shall lawfully and peaceable have, hold, possess, use, occupy and enjoy the Demised Premises as long as this Lease remains in force, without hindrance, disturbance or molestation from Lessor, subject to the specific provisions of this Lease.

22.0 LESSOR'S EXCULPATORY CLAUSE

22.1 Lessee agrees to look solely to Lessor's interest in the demised Demised Premises as security for the satisfaction of any claim, judgment, or decree as might arise requiring Lessor to pay damages to Lessee. In no event shall any other property, real or personal of Lessor or its heirs, successors, or assigns be subject to levy, execution, or enforcement for the purpose of satisfying any such claim, judgment, or decree.

23.0 TIME OF THE ESSENCE

23.1 Time is of the essence for performance by Lessor and Lessee of each provision and condition of this lease.

24.0 SUBORDINATION

24.1 Lessee hereby subordinates all of its right, title and interest in and under this Lease to the lien of any mortgage or mortgages, or the lien resulting from any other method of financing or refinancing, now or hereafter in force against the real estate and/or buildings of which the demised Demised Premises are a part or against any buildings hereafter placed upon said real estate of which the demised Demised Premises are a part.

25.0 PARTIES BOUND

25.1 The provisions, covenants and conditions of this Lease shall bind and inure to the benefit of the legal representatives, successors and assigns of each of the parties, except that no assignment or subletting by Lessee without the written consent of Lessor which consent shall not be withheld unreasonably shall vest any right in the assignee of Lessee.

26.0 HOLDING OVER

26.1 No holding over and continuation of any business by Lessee after the expiration of the lease term shall be considered to be a renewal or extension of this lease unless written approval of such holding over and definite agreement to such effect is signed by Lessor defining the length of such additional term. Any holding over without the consent of Lessor shall be considered to be a daytoday tenancy at a rental rate of two (2) times the daily rate of the maximum monthly payment computed on the basis of a thirty-day (30 day) month.

27.0 FORCE MAJEURE

27.1 Any prevention, delay, or stoppage of work or other obligation to be performed by Lessor or Lessee which is due to strikes, labor disputes, inability to obtain labor, materials, equipment or reasonable substitutes therefore, acts of God, governmental restrictions or regulations or controls, judicial orders, enemy or hostile government actions, terrorism, civil commotion, fire or other casualty, or other causes beyond the reasonable control of the party obligated to perform hereunder, shall excuse performance of the work or obligation by that party for a period equal to the duration of that prevention, delay, or stoppage.

28.0 NOTICES

Initials

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Lessor Lessee

28.1 All notices required or permitted by the terms of this Lease must be given by United States registered or certified mail, or hand-delivery, addressed to:

Lessee at: Chestnut Hill Tree Farm
c/o Robert D Wallace
1310 SW 13th Street – Unit 4
Gainesville, FL 32601

Lessor at: Ponce Inlet Development LLC
15105 NW 94 Ave
Alachua, FL 32615

Notice shall be deemed delivered on the date when it is deposited in the United States mail, postage prepaid, according to this Paragraph. The parties shall promptly notify each other of any change in address for notice purposes.

29.0 RECORDING

29.1 This Lease Agreement may not be recorded in the Public Records of any county in Florida or elsewhere; however, a short memo form of the agreement may be recorded upon request of the parties' lender(s).

30.0 RADON GAS

30.1 **Radon is a naturally occurring radioactive gas that, when it has accumulated in a building in sufficient quantities, may present health risks to persons who are exposed to it over time. Levels of radon that exceed federal and state guidelines have been found in buildings in Florida. Additional information regarding radon and radon testing may be obtained from your county public health unit.**

31.0 MISCELLANEOUS PROVISIONS

31.1 Complete and Binding Agreement. This Lease contains the complete agreement of Lessor and Lessee, and supersedes all prior written or oral discussions, agreements, communications, or representations. This Lease may be amended, modified, or supplemented only in writing signed by the parties intending to be bound. This paragraph shall survive the termination or expiration of this Lease.

31.2 Leases Separate. The terms of this Lease are based in part on the individual needs of Lessee and there is no relation between this Lease and the terms of any lease of any other Lessee of the multi-use building.

31.3 Provisions Severable. Both parties have had an opportunity to review this Lease with the counsel of their choosing. In the event of litigation or related legal action involving this lease, the terms and conditions of this lease shall be interpreted as of equal weight between Lessor and Lessee as co-drafters of this lease. If any provision of this Lease is found to be invalid or otherwise unenforceable by a tribunal of competent jurisdiction, the remaining provisions hereof shall remain in full force and effect.

31.4 Governing Law. This Lease shall be governed by, and construed in accordance with, Florida law. The parties specifically waive any and all right to jury trial as to any issue in any action based on or arising out of this Lease.

IN WITNESS WHEREOF, the parties have caused this Lease Agreement to be executed and sealed the day and year above first written.

WITNESSES:

Stacy Klenetti

Printed Name: Stacy Klenetti

Heather Blake

Printed Name: Heather Blake

LESSOR:
PONCE INLET DEVELOPMENT LLC,
a Florida Limited Liability Company

Robert D. Wallace, Manager

WITNESSES:

Stacy Klenetti

Printed Name: Stacy Klenetti

Heather Blake

Printed Name: Heather Blake

LESSEE:
Chestnut Hill Tree Farm LLC,
a Florida Limited Liability Company

Initials

Lessor Lessee

RENT ADDENDUM

The monthly rental payable (including CAM estimates) by Lessee hereunder shall be as follows:

1.0: Minimum Rents. The Base Rate shall be $25.00 per square foot per year times 1,274 square feet of space in the Demised Premises:

Lease Year(s)	Lease Amount
1-3	$25.00/SF/YR x 1,274 SF = $31,850/yr = $2,654.17/month

1.2 Common Area Maintenance. CAMs for lease year 1 will be fixed at $1.50 per square foot per year, lease years 2-3 will be adjusted based on actual center CAM costs.

Together with the payment of rent, Lessee shall pay any sales tax, gross receipts tax, or any charge imposed upon Lessee with respect to the receipt of collection of rent. All rent shall be paid in advance on the first (1st) day of each month at the address specified for notices to Lessee, such rent to be paid without demand.

	Lessor	Lessee
Initials		

Part 3.C.3.b. Compliance with local regulations regarding sanitation and waste disposal

Chestnut Hill Tree Farm's waste management policies detail the operational procedures for cannabis waste disposal. The Cultivation Director, in collaboration with the Chief Operating Officer and Facilities Manager, is assigned responsibility for enforcing policies and procedures relating to cannabis waste management in the cultivation unit. Pursuant to Section 64-4.002 Part (c), all waste, including waste composed of or containing finished cannabis and Derivative Products, will be stored, secured, and managed in accordance with applicable state and local statutes, ordinances, and regulations. The company's waste disposal procedures are detailed in the Standard Operating Procedures.

The dispensary will log and secure waste onsite. All waste will be manifested and returned to the cultivation facility for disposal. All disposed waste will be recorded in the waste disposal log with details pertaining to the date of disposal, type and quantity of waste disposed of, manner of disposal, and the name of the patient who supplied the waste if applicable. Additional waste disposal provisions include detailed plans for excess product disposal, liquid and solid waste disposal based on guidelines from environmental agencies, composting practices, and the disposal of expired, contaminated, or otherwise unusable Derivative Products.

All managers are responsible for ensuring the quality and safety of Derivative Products in their inventory on a daily basis. Each operational unit will ensure that expired, contaminated, or otherwise unusable Derivative Products are returned to the cultivation facility for disposal in accordance with the company's waste management policies and properly recorded in the inventory management or point of sale systems.

As the company shall initially produce oil extractions, production will utilize as much viable cannabis as possible, reducing excess medical cannabis waste from operations.

Patients will be encouraged to return any unused medical cannabis products to the dispensing facility to ensure appropriate waste management. The dispensing facility will have in place a standard operating procedure related to the intake of this material, separation from products that are for sale, and return to the cultivation facility for proper disposal.

Part 3.C.3.c. The ability to obtain zoning approval

Chestnut Hill Tree Farm has secured two potential dispensary locations. The second location serves as a back-up to the first location if for any reason the facility cannot be established at that location. A status regarding zoning determinations for Dispensing Ogranizations from the City of Gainesville is included for reference. The City has not determined the appropriate use code(s) and still has the matter under consideration. The second facility is currently approved by Alachua County.

1. 1310 SW 13th St.., Unit 4, Gainesville, FL 32601
2. 422 SW 140th Terrace, Newberry, FL 32669

CITY OF GAINESVILLE
every path starts with passion
FLORIDA

Planning & Development Services
Station 11
PO Box 490
Gainesville, FL 32627-0490
352-334-5022
352-334-2648 (fax)
www.cityofgainesville.org

June 23, 2015

1310 SW 13th St., Gainesville, FL

Robert D. Wallace, CEO
Chestnut Hill Tree Farm, LLC
15105 NW 94th Avenue
Alachua, FL 32615

Re: Low-THC Cannabis Derivative Products Dispensary

Dear Mr. Wallace:

This letter follows your inquiry regarding whether the City of Gainesville's zoning laws allow 'dispensing facilities' as that term is defined in Rule Chapter 64-4 of the Florida Administrative Code, within any of the City's zoning districts. Given that such 'dispensing facilities' did not exist prior to adoption by the Florida Legislature of the Compassionate Medical Cannabis Act of 2014 and adoption of the implementing rule by the Department of Health, the zoning laws of the City does not specifically allow or address such facilities.

Recognizing a need to address this newly established use, the Gainesville City Commission directed the Planning and Development Services Department on May 7, 2015, to initiate a petition to amend the Gainesville Land Development Code to allow 'dispensing facilities' and to provide regulations governing the location and operation of such facilities within the City consistent with state law. This office is now working on that petition with the City's legal staff. Once completed, it will be reviewed by the City Plan Board (CPB) in accordance with the requirements of Chapter 163, Florida Statutes and the CPB will make a recommendation to the Gainesville City Commission. After receiving the CPB recommendation the City Commission will hear the petition and determine whether to adopt an ordinance allowing medical marijuana dispensing facilities.

Sincerely,

Ralph Hilliard

Ralph Hilliard
Planning Manager

Copy: C. David Coffey, Esq.

ALACHUA COUNTY
DEPARTMENT OF GROWTH MANAGEMENT
OFFICE OF PLANNING AND DEVELOPMENT

10 S.W. 2nd Avenue · Third Floor · Gainesville, Florida 32601-6294
Tel: (352) 374-5249 · Fax: (352) 338-3224

Steven Lachnicht, AICP
Director
Growth Management

Richard Wolf
Assistant Director
Growth Management

Ken Zeichner, AICP
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Missy Daniels, AICP
Principal Planner
Development Services

Tom Webster
Housing Program Manager

Brenda Wheeler
Development Review Manager

Jeffrey Hays, AICP
Transportation Planning Manager

Gregory A. Ferrone
Building Official

Benny Beckham
Zoning Administrator

March 5, 2015

M E M O R A N D U M

To: James Harriott, Asst. County Manager

From: Steve Lachnicht, Director: Department of Growth Management

Re: Siting of Marijuana-Related Businesses in Alachua County

At the direction of the Board, County staff reviewed the Land Development Code to determine how marijuana-related businesses would be sited in Alachua County. Staff's analysis is based on the statute and currently proposed rule, both of which are subject to change in the next few months. As staff understands marijuana-related businesses, these businesses will have three functions: 1) cultivating the marijuana plants, 2) processing the marijuana plants; and 3) dispensing the marijuana product. Under the County's Code, these are agricultural, industrial, and commercial uses, respectively. These functions of the marijuana-related businesses would be allowed in their respective districts under the Land Development Code. The proposed state rules for these businesses are very detailed and appear to address any potential local concerns. Therefore, with the currently proposed rules, there does not appear to be a need for additional local zoning regulations.

The current draft of the proposed rules allows cultivating, processing, and dispensing to occur at one or more locations. Under the County Code, for example, the plants could be grown in a rural/agricultural district, processed in an industrial district, and dispensed in a commercial district. Based on staff's understanding of the process associated with cultivating, processing, and dispensing low THC marijuana, a marijuana-related business could be structured in multiple configurations, ranging from all three functions on a single site to each function on a separate site. Alachua County's Code would allow each of these configurations within proper zoning districts.

Under the current language of the proposed rules, applicants to the State for authorization to operate a marijuana-based business must demonstrate their ability to obtain zoning approval from the local government. Due to the ongoing rulemaking process, staff anticipates that it will be at least a month, likely longer, before a marijuana-related business will be operating within the County.

Alachua County
Board of County Commissioners

Charles "Chuck" Chestnut, IV, *Chair*
Robert "Hutch" Hutchinson, *Vice Chair*
Mike Byerly
Ken Cornell
Lee Pinkoson

Administration
Dr. Lee A. Niblock, CM
County Manager

June 30, 2015

422 SW 140th Terrace, Newberry, FL 32669

Patricia Nelson, Director
Office of Compassionate Use
Florida Department of Health
4052 Bald Cypress Way
Tallahassee, FL 32399

Dear Ms. Nelson:

I am strongly in support of Chestnut Hill Tree Farm in their application to become a grower and dispensary under SB 1030, to produce Charlotte's Web low-THC medical marijuana in the State of Florida. I have known and respected this business for decades, and believe Mr. Wallace and his company have the right combination of botanical, pharmaceutical, and business acumen for this to be an asset to Alachua County and the State of Florida.

Chestnut Hill, with the participation of leading scientists and researchers from the University of Florida and around the nation, including Josh Stanley the developer of Charlotte's Web strain of cannabis, will help create the groundwork for future research and development of treatments for illnesses that will benefit millions. Chestnut Hill's plan is to research and develop safe and effective delivery of medicine derived from marijuana strains. This focus is timely and appropriate, and is the type of collaboration that happens in many other endeavors in Alachua County.

I have followed the state's policy and rules development, and Alachua County has already looked at the parallel local land use and business regulations that are required. Our research infrastructure, welcoming business climate, and progressive local government will all contribute to its success.

Please contact me if you need additional information – thank you for your careful consideration and support of this proposal.

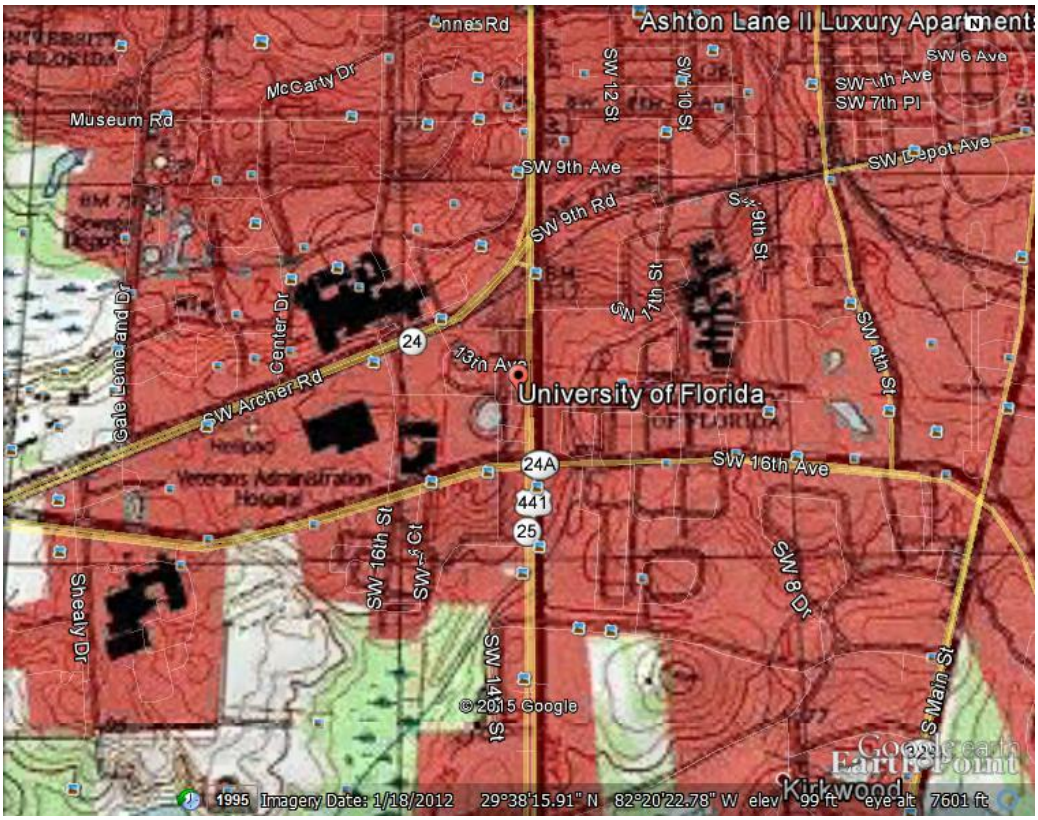
Sincerely,

Robert Hutchinson
Alachua County Commissioner

P.O. Box 5547 ■ Gainesville, Florida 32627 ■ Tel. (352) 264-6900 ■ Fax (352) 338-7363
TDD (352) 491-4430, or call 711 Relay
Commissioners' E-Mail: bocc@alachuacounty.us ■ Home Page: www.alachuacounty.us
An Equal Opportunity Employer M.F.V.D.

Part 3.C.3.d. Sketch or other illustration approximating the property boundaries, land topography, vegetation, proposed and/or existing structures, easements, wells, and roadways for each property proposed

1310 SW 13TH ST., UNIT 4, GAINESVILLE, FL 32601



422 SW 140TH TERRACE, NEWBERRY, FL 32669

Part 3.C.3.d. Sketch or other illustration approximating the property boundaries, land topography, vegetation, proposed and/or existing structures, easements, wells, and roadways for each property proposed

Part 3.C.3.e. A description of the ability or plan to expand any of the areas proposed for dispensing Derivative Products

Chestnut Hill Tree Farm has leased over 1,270 sq. ft. for its dispensing facility at the selected site in Gainesville, Florida. The company plans to utilize the space entirely for its dispensing activities. The company's secondary back-up location in Newberry features over 9,150 sq. ft.

Either facility allows for the company to adequately serve its projected patients. Should demand begin to strain the dispensary's capacity before anticipated, the company will secure additional facilities in select areas across the state to service the Florida patient population. Chestnut Hill Tree Farm anticipates that the facilities secured as they relate to the current legislation are more than sufficient to meet demand for the next several years.

Part 3.C.3.f. Description of the methods proposed for the dispensing of Derivative Products, including the following: i. Accessibility of dispensing facilities, e.g., centrally located to several populated areas, located on a main roadway, not in a high crime area, etc.; ii. Proximity of dispensing facilities to patient populations; and iii. Alternative dispensing, e.g. delivery

LOCATION 1:
1310 SW 13TH ST., UNIT 4, GAINESVILLE, FL 32601

ACCESSIBILITY

The proposed 1,200 sq. ft. dispensing facility is located immediately adjacent to the University of Florida Health – Shands Medical Center. This location provides accessibility to patients from all over the state receiving medical treatment. The location is highly accessible from I-75, Hwy 441, Hwy 301 and SR 26. The location is also served by public transportation and the hospital's shuttle. The area features a low crime rate providing safe access to patients and their legal representatives. Medical facilities, retail shops, and restaurants in the facility as well as adequate parking for patients and consumers make the location ideal.

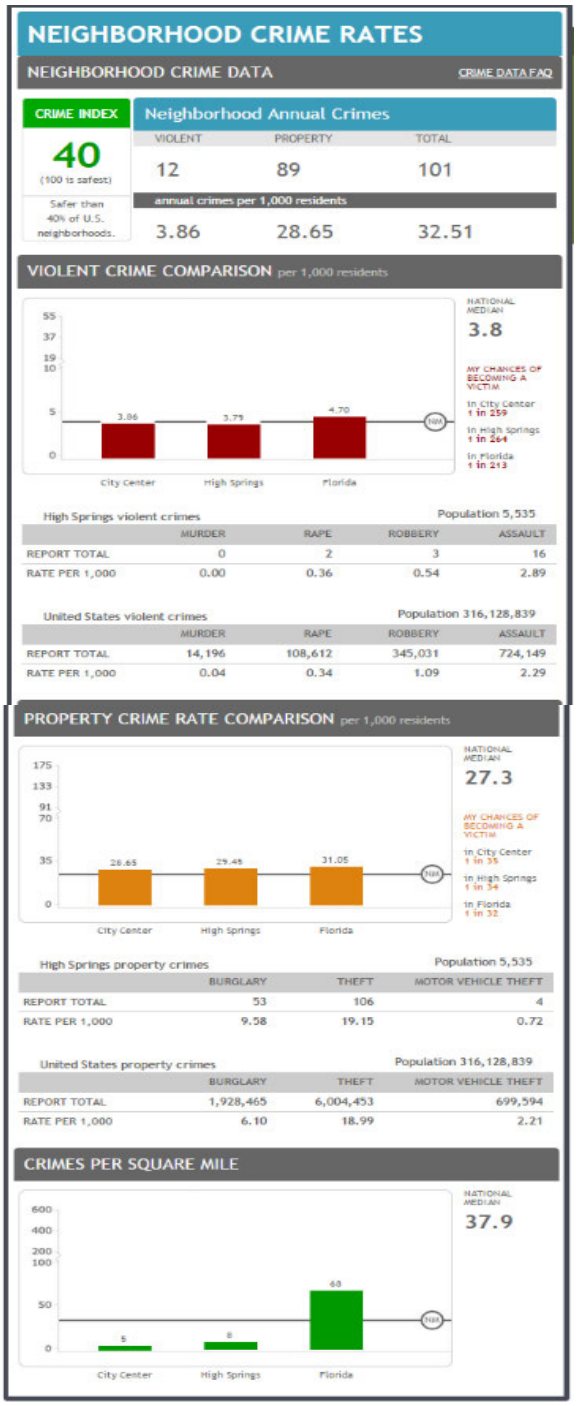
HOURS OF OPERATION

The dispensary will be open from 7:30am until 7:30pm daily. Staff will be required to arrive 30 minutes prior to opening and remain 30 minutes after closing. Based on sales volume, delivery schedules, patient feedback, and with consideration for the local zoning and the surrounding community, the company will expand or contract hours of operation and days of operation. It will consider many alternative schedules such as later evenings or earlier morning starts to accommodate the needs of patients. The company will work with its patients and the communities to optimize this schedule for all parties.

DESCRIPTION OF THE FACILITIES

The proposed dispensing facility is an enclosed, secure facility, and is suitable for the effective and safe distribution of Derivative Products. The building and proposed renovation plan ensures the facility is sufficient in size to meet patient needs. The company designed the facility with the advice of consultants qualified in the cannabis industry to develop efficient and workable spaces.

The company will focus on a dispensary design that provides a high level of safety in a discrete manner. Using design principles adopted from the healthcare industry, the patient-focused features of each dispensing facility will minimize noise, maximize lighting and ventilation, and deliver comfortable seating.



Part 3.C.3.f. Description of the methods proposed for the dispensing of Derivative Products, including the following: i. Accessibility of dispensing facilities, e.g., centrally located to several populated areas, located on a main roadway, not in a high cr

Patients will enter a comfortable, well-lit, and highly secure facility. Many patients seeking treatment may be there as a last resort following long-term suffering from chronic or life-threatening illnesses. Treatment plans will focus on open communication, symptom management, ease of access to the facility, and finding the right Derivative Product for each patient.

The company and the patients it serves will benefit significantly from our management and advisory teams. They bring invaluable experience and expertise, as it relates to designing a company dedicated to efficiently delivering high-quality health care products to patients. Susan Baumgartner, PharmD, MBA will lead the organization's strategic plan. The company's science and healthcare advisors will shape the direction of its activities including research and patient care. The company's business model, its team, and its patient-focused philosophy will make it one of the most respected and reliable Dispensing Organizations in the State of Florida and in the nation.

PATIENT-FOCUSED FACILITY FEATURES

The dispensing facility is designed to make patients feel safe and comfortable. The physical features of the facilities will promote a warm, compassionate and comforting space. The facility is designed to include a public waiting area outside of the private patient consultation/sales rooms so patients know their escorts are comfortable while they wait. Patients and escorts will have access to a clean restroom and fresh water.

Upon entering the facility, patients will be greeted by the patient associate. The associate will verify the patient or legal representative's credentials before allowing access to the secured patient area. The secured patient area of the dispensing facility will not only feature a soothing and welcoming waiting area, but will also feature two private consultation rooms, and multiple point of sale stations for efficient patient throughput.

The dispensing facility building, its parking lot, and its entrances are designed to be in full compliance with the Americans with Disability Act (ADA) and all zoning and building ordinances. The facility restrooms will fully comply with all ADA requirements for convenient wheelchair access. Furnishing in the private transaction rooms will also accommodate wheelchair access (e.g., lower counters).

Part 3.C.3.f. Description of the methods proposed for the dispensing of Derivative Products, including the following: i. Accessibility of dispensing facilities, e.g., centrally located to several populated areas, located on a main roadway, not in a high cr

LOCATION 2:
422 SW 140TH TERRACE, NEWBERRY, FL 32669

ACCESSIBILITY

The proposed 9,000 sq. ft.+ dispensing facility is located 11 miles west of Gainesville, FL. The location is accessible from I-75 and SR 26. The area features a very low crime rate providing safe access to patients and their legal representatives.

HOURS OF OPERATION

The dispensary will be open from 7:30am until 7:30pm daily. Staff will be required to arrive 30 minutes prior to opening and remain 30 minutes after closing. Based on sales volume, delivery schedules, patient feedback, and with consideration for the local zoning and the surrounding community, the company will expand or contract hours of operation and days of operation. It will consider many alternative schedules such as later evenings or earlier morning starts to accommodate the needs of patients. The company will work with its patients and the communities to optimize this schedule for all parties.

DESCRIPTION OF THE FACILITIES

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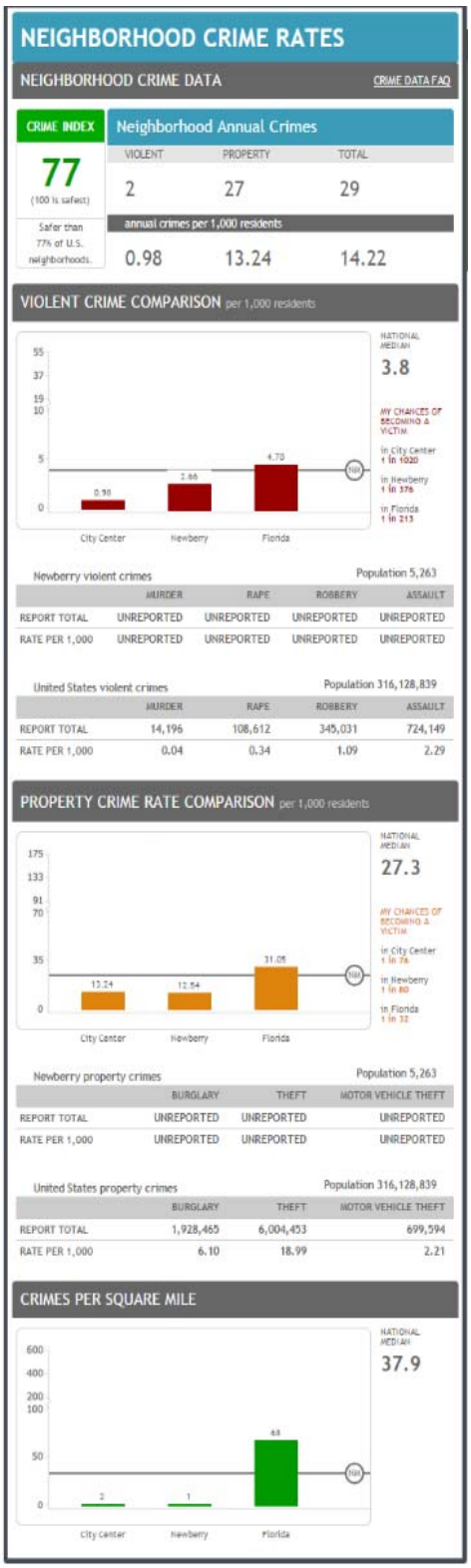

Part 3.C.3.f. Description of the methods proposed for the dispensing of Derivative Products, including the following: i. Accessibility of dispensing facilities, e.g., centrally located to several populated areas, located on a main roadway, not in a high cr

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PROXIMITY TO PATIENT POPULATIONS – ALACHUA COUNTY, FLORIDA

Alachua County, Florida Chronic Disease Profile						
	Year(s)	Avg. Annual Number of Events	Age-Adjusted Rate[1]	Quartile[2]	State Age-Adjusted Rate	U.S. Healthy People 2010 Goal[3]
Lung Cancer						
Deaths	2011-13	114	47.4	2	44.5	45.5
Incidence	2009-11	169	75.8	3	63.4	
Adults who are current smokers	2013		15.90%	1	16.80%	12%
Colorectal Cancer						
Deaths	2011-13	34	14.2	2	14.1	14.5
Incidence	2009-11	93	41.4	4	38	
Adults 50 years of age and older who received a sigmoidoscopy or colonoscopy in the past five years	2013		53.60%	3	55.30%	
Adults 50 years of age and older who received a stool blood test in the past year	2013		5.30%	4	13.90%	
Breast Cancer						
Deaths	2011-13	33	24.6	3	20.4	20.6
Incidence	2009-11	167	138.3	4	113.4	
Prostate Cancer						
Deaths	2011-13	23	24.1	4	17.8	21.2
Incidence	2009-11	136	125.4	4	115.8	
Cervical Cancer						
Deaths	2011-13	4	2.5	2	2.8	2.2
Incidence	2009-11	9	8	2	8.9	

Part 3.C.3.f. Description of the methods proposed for the dispensing of Derivative Products, including the following: i. Accessibility of dispensing facilities, e.g., centrally located to several populated areas, located on a main roadway, not in a high cr

Alachua County, Florida Chronic Disease Profile						
	Year(s)	Avg. Annual Number of Events	Age-Adjusted Rate[1]	Quartile[2]	State Age-Adjusted Rate	U.S. Healthy People 2010 Goal[3]
Women 18 years of age and older who received a Pap test in the past year	2013		36.70%	4	51.40%	93%
Melanoma						
Deaths	2011-13	8	3.4	3	3	2.4
Incidence	2009-11	53	23	3	18.8	
Chronic Lower Respiratory Diseases (CLRD)						
Deaths	2011-13	89	39	2	39.6	50.1
CLRD Hospitalizations	2010-12	870	382.7	2	368.2	
Adults who currently have asthma	2013		12.90%	4	8.30%	
Asthma Hospitalizations4	2010-12	2,115	920.2	4	780.4	
Diabetes						
Deaths	2011-13	64	27.4	3	19.6	65.8
Hospitalizations4	2010-12	5,889	2,530.20	3	2,291.20	
Adults who have ever been told they had diabetes	2013		7.20%	1	11.20%	

DELIVERY PROGRAM

The company will implement a robust delivery program to make its Derivative Products available to all Florida residents. The company will utilize its vehicles described in section 2.e. to deliver to patients' homes. Delivery will not be available to any location other than a residence. Delivery vehicles feature secure, climate controlled storage for all Derivative Products. The company's vault manufacturer, Custom Vault, will design and manufacture climate controlled vaults for inter-company transfers and deliveries.

BioTrackTHC will produce transportation manifests while GPS tracking and vehicle surveillance systems provide security throughout the entire delivery. Body cameras will ensure the driver is monitored at all times, even when out of the vehicle and in patients' homes. This layer of protection provides the company assurance that it can identify and investigate any transportation incident.

Part 3.C.3.f. Description of the methods proposed for the dispensing of Derivative Products, including the following: i. Accessibility of dispensing facilities, e.g., centrally located to several populated areas, located on a main roadway, not in a high cr

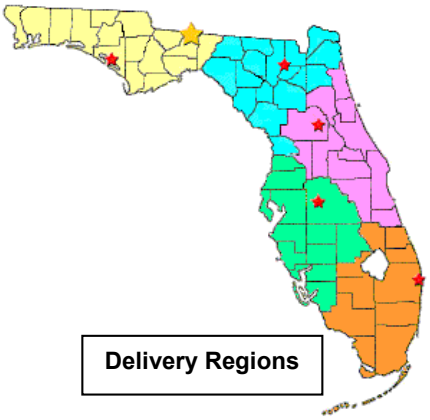
The company will deliver to all five regions once per week adjusting for demand. Two person delivery teams for home deliveries ensure security and service. A Patient Associate will deliver Derivative Products to patients and be available for any questions. Deliveries will occur on weekdays only between the hours of 8:00 am and 5:00 pm. All delivery requests will be verified and fulfilled through the dispensary. Delivery staff will be equipped with identification verification technology.

DELIVERY POLICIES

- All home delivery orders must be processed in the dispensary and be accompanied by a sales receipt. A Patient Associate is required to provide the first delivery to a new patient.
- Patient or authorized legal representative identification and registration must be verified with each delivery and a signed manifest is required.
- All intercompany transfers of Derivative Products will be recorded and documented as a inter-company transfer.
- All deliveries must be approved by Dispensing Manager and be accompanied by a manifest.
- All employees will be trained in accordance with the company's training policies. All managers are responsible for developing and fostering a culture of safety. All employees will receive regular security, anti-diversion, and transportation training including a focus on cargo theft risk awareness.

HOME DELIVERY PLAN

Orders will be processed in the dispensary and scheduled by the vehicle tracking system. The Security Director will oversee all transportation activities in coordination with the facility managers. The company will alternate delivery routes to five regions, shown below, but will ensure each region has access to one delivery day per week. The company will charge patients the cost of the delivery based on mileage and staff costs for the delivery program.



DELIVERY PROCEDURES

Authorized delivery personnel required

Only a dispensary employee may transport Derivative Products on behalf of the company, whether between company facilities or to qualifying patients and their legal representatives. The Security Director must provide authorization for any employee to transport Derivative Products for the company upon MVR investigation and bonding. Two employees are required for each delivery and must carry their identification at all times and provide it to authorities upon request. One employee must stay with the vehicle at all times when Derivative Products is present in the vehicle.

Part 3.C.3.f. Description of the methods proposed for the dispensing of Derivative Products, including the following: i. Accessibility of dispensing facilities, e.g., centrally located to several populated areas, located on a main roadway, not in a high cr

Shipment verification

Prior to transport a manager must weigh, inventory, and account for on video and in BioTrackTHC all Derivative Products. Immediately upon arrival to company facility (excluding home deliveries), and no later than twelve hours after arrival, two employees, including a manager must re-weigh, re-inventory, and account for on video and in the inventory system all products received.

Manifest required

The employee responsible for packaging a delivery order must complete a shipping manifest in a form and manner determined by the company, file a copy at the origination location, carry a copy of the manifest with the products being transported, and obtain an original signature from the recipient. Shipping manifests will be retained for no less than five years and made available to the OCU or law enforcement upon request.

Loading areas

Areas used to load vehicles for transportation will be limited access areas and must be secured. The Security Director in coordination with the Transportation Manager must ensure and maintain security in all loading areas. The company will secure any loading areas with:

- Physical barriers guarding against unauthorized access to the area.
- Locking vehicle access gates controlled by the transportation manager.
- Access control points must include the positive identification of all employees and service providers at all points of entry.
- The alarm system must provide silent alarm capability and full coverage video surveillance of all loading areas.
- The general manager in coordination with the human resources manager shall authorize access to loading areas and issue employee keys and codes.

Transportation vehicles

- Any vehicle used to transport Derivative Products must have a secure, locked storage compartment that is part of the vehicle.
- The Transportation Manager must ensure all transportation vehicles are compliant prior to authorizing a transfer to the vehicle.
- Any vehicle used for transportation of Derivative Products may not bear any markings that indicate the vehicle is being used to transport Derivative Products or that indicates the company's name.
- Each vehicle used for transport of Derivative Products shall have a global positioning system monitoring device that is monitored by the Transportation Manager during transport.
- No Derivative Products may be visible from the outside of the vehicle.
- Transportation records will be retained for no less than five years.

Route planning

- No unplanned stops will be made when transporting Derivative Products unless authorized the Transportation Manager or Security Director.
- The Transportation Manager shall ensure that all delivery times and routes are randomized.

Geographic risk

Part 3.C.3.f. Description of the methods proposed for the dispensing of Derivative Products, including the following: i. Accessibility of dispensing facilities, e.g., centrally located to several populated areas, located on a main roadway, not in a high cr

The Transportation Manager and Security Director in coordination with law enforcement and third-party security advisors will identify "security risk geographies" with respect to local crime rate, socioeconomic environment, political and legal conditions hindering, or supporting cargo theft. Deliveries to high risk geographies must be approved by the Chief Operating Officer.

CARGO THEFT PREVENTION MEASURES

The Transportation Manager will employ best practices updated as often as possible to mitigate cargo theft risk. The Transportation Manager will have the authority to employ a third-party advisor as necessary to assist in the development of policies and procedures. Cargo theft prevention measures include, but are not limited to:

- Strategically partnered transport teams;
- Regular employee briefings focused on awareness;
- Risk-based route planning;
- Active vehicle monitoring using GPS tracking systems;
- Secure radio or satellite communication equipment to communicate with personnel at the delivery origination point at all times when the vehicle contains Derivative Products;
- Utilization of hidden GPS locators in shipping containers; and
- Use of escort vehicles for high-risk deliveries.

TWO-WAY RADIO COMMUNICATION

Each delivery vehicle will be equipped with two-way radio communication equipment which may include cell phones with push to talk capabilities. The Transportation Manager will ensure the system is operational and each employee who transports Derivative Products is trained appropriately on its use. Employee will adhere to the following procedures whenever using radio equipment:

- The "Transportation" channel may only be used for transportation operations.
- The transporting vehicle must perform a radio check-in every hour on hour (X:00). The Transportation Manager or their designee at the facility shall copy. In the event of a hostage situation, if able, the dispensary agent should indicate "Code 0100" if the facility is not previously aware of the hijacking.
- The Transportation Manager or other employee receiving a "Code 0100" transmission must notify authorities immediately of the vehicle's location, occupants, and contents.
- If any suspicious activity occurs during transport, the employee shall maintain radio communication during the event to report all details to the facility.
- If two-way radio communication fails for any reason, the employee should make contact by cell phone or land-line immediately after a communication fails.

TRANSPORTATION REPORTING REQUIRED

The Transportation Manager shall be responsible for reporting all transportation events. In the case of an emergency stop, a detailed reporting in the transportation event log will be recorded describing the reason for the event, the duration, the location, and any activities of personnel exiting the vehicle. The Security Director will report to the OCU and local law enforcement any vehicle accidents, diversions, losses, or other reportable incidents as that occur during transport, within twenty-four (24) hours as necessary. Reportable transportation incidents may include:

- Discrepancies identified during inventory, diversion, theft, loss, and or criminal action in transportation operations;

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- Any suspicious act involving the transportation of Derivative Products by any person;
- Unauthorized destruction of Derivative Products during transportation;
- Any loss or unauthorized alteration of records related to Derivative Products transportation; and
- Any other breach of security.

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STAFFING PLAN

The company's staffing plan details the processes that the Human Resources Manager will use to manage all of the company's human resources in compliance with state law. The Human Resources Manager is responsible for maintaining and updating the company's staffing plan, which will ensure that the company has the right quantity of staff with the correct skill-sets and experience needed to ensure the success of all operations.

The employee acquisition process and procedures for skill-set assessments, terminations, and transitions is detailed in the staffing plan. It is established that no employee or consultant may work onsite prior to receiving orientation training or when any required critical training is eight weeks or more past due.

MANDATORY STAFFING PLAN COMPONENTS

Dispensing facilities will not be open or in operation unless at least one manager and one other employee is on the premises and directly supervising the activity within the facility. Staff involved in activities related to dispensing of approved Derivative Products must:

- Be 21 years of age or older.
- Not have been convicted of any felony of sale or possession of drugs, narcotics, or controlled substances in accordance with the requirements of section 3364 of the Public Health Law.

PERSONNEL RECORDS

Policies

The Human Resources Manager will maintain a current organizational chart and job descriptions for each employee of the company.

Employee Records

The Dispensary Manager, in coordination with the Medical Director, will maintain accurate dispensing facility personnel records for each employee. Such records must be maintained for at least five years and include:

- All materials submitted to the OCU;
- Documentation of verification of references;
- The job description or employment contract that includes duties, authority, responsibilities, qualifications, and supervision;
- Documentation of all required training, including training regarding privacy and confidentiality requirements, and the signed statement of the individual indicating the date, time, and place he or she received required training and the topics discussed, including the name and title of presenters;
- Documentation of periodic performance evaluations; and
- A record of any disciplinary action taken.

Compensation Records

The Human Resources Manager will maintain records documenting the salary and wages paid to each employee, stipend paid to each board member, and any executive compensation, bonus, benefit, or item of value paid to any individual affiliated with the company. Such records must be maintained for a period of at least five years.

Confidentiality of Employee Records

Information held by the company about qualified patients, designated legal representatives, and employees is confidential and will not be disclosed without the written consent of the individual to whom the information applies, or as required under law or pursuant to an order from a court of competent jurisdiction. However, the OCU may access this information to carry out official duties.

DISPENSARY MANAGEMENT TEAM

The Chief Executive Officer, in partnership with the Medical Director, provides leadership in achieving the dispensary's philosophy, mission, strategy, and annual goals. The Chief Executive Officer is responsible for leading the executive management team, initial staffing, and communicating and cooperating with the OCU.

The Medical Director reports to the Chief Executive Officer. The Medical Director will be licensed, in good standing as a physician, as defined by Florida law. The Medical Director will work closely with the Chief Executive Officer in the development and implementation of dispensary's strategies, policies and procedures, and staff training to ensure organizational effectiveness and compliance with rules and regulations.

The Dispensary Manager reports to the Medical Director. The Dispensary Manager is responsible for inventory controls, inventory monitoring, and ensuring the dispensary's strategies, policies, and procedures are properly implemented. The Dispensary Manager will also work closely with the Outreach Manager to develop educational and training materials for patients and the community.

The Security Director reports to the Chief Operating Officer. The Security Director will oversee the installation and operation of security systems, ensure compliance with all rules and regulations, and supervise Security Officers in the dispensary. The Security Director is responsible for all security-related matters and will work closely with the Dispensary Manager and to ensure security protocols are being followed.

The Outreach Manager reports to the Medical Director. The Outreach Manager, in partnership with the Dispensary Manager and Patient Associates, is responsible for developing patient programs and services including patient, physician, and community education, substance abuse assistance, referral program to other wellness services, and a hardship grant program. The Outreach Manager and Medical Director will plan and market community outreach events, educational sessions, as well as identify local community organizations with which to partner.

DISPENSARY STAFF

The Dispensary Manager reports to the Medical Director. The Dispensary Manager is responsible for the dispensary's day-to-day operations, employee training and supervision, managing cash flows and daily bank transactions, and coordinating all deliveries, recalls, inventory management, the recordkeeping system, and keeping necessary documents secure, yet readily accessible for inspection. The Dispensary Manager will oversee the dispensary staff and dispense Derivative Products.

Patient Associates report to and assist the Dispensary Manager in supervising and coordinating all aspects of the dispensary to assure high-quality, best-practice delivery of services to patients or legal representatives, consistent with all rules, requirements, and regulations. Patient Associates will provide patient consultation and resource referral. Under the supervision of the Dispensary Manager, the Patient Associate will dispense Derivative Products and perform new patient intake and orientation, update patient records and profiles, and operate point of sale terminals.

Currently the operation has selected the following staff members. Resumes are included for the staff.

- Chief Executive Officer – Robert Wallace
- Chief Operating Officer – Susan Baumgartner
- Information Technology Director – R. Dunstan Wallace
- Inventory Director – R. Dunstan Wallace
- Cultivation Director – Codi Coleman
- Security Director – John Powell
- Controller/Human Resources Manager – Deborah Gaw

Several advisors and consultants have been engaged for services post-licensing. Biographies are included for review:

- Brady Blake - cultivation
- Josh Stanley, Citiva Medical – genetics and product development
- Donn Dennis, MD – internationally-recognized expert in pharmaceutical sciences and drug delivery
- Margaret Gedde, MD – routes of administration, patient care
- Samuel Glucksman, PhD - cultivation
- Jill Lamoureux - operations
- Jahan Marcu, PhD – quality assurance
- Thomas McGinity – healthcare services
- Kristopher Palmer - cultivation
- Mark Rice, MD – science and research
- John Shermyen – healthcare services
- Shannon Wilson – extraction

The following processing positions will be filled upon licensing. Our advisory board will help recruit and train these roles:

- Quality Assurance Officer – Green Standard Diagnostics, Jahan Marcu, PhD, will initially provide contract services for this position.
- Dispensary Manager
- Patient Associates will be hired as needed to maintain service levels

ADVISORY ROLES

The company has engaged a team of advisors to assist the transition to the new medical cannabis line of business. These advisors provide the company the opportunity to access expert advice that would not be available for hire. The advisors who will be in close contact with products will also be contract employees of the company, defined as employees for legal purposes. Those who simply provide operational advice and guidance will receive stipends for participation in regular meetings of the strategic advisory board and will be compensated for any additional time providing specific advice. The advisory board will help set the strategic goals for the company, while assisting with day-to-day start-up and business development in the beginning stages of the operation. These advisory will help the company avoid critical errors that could prevent medical cannabis supplies from getting to patients who have been waiting for a great deal of time for the program to become functional.

ADVISORY BOARD

The strategic advisory board, if utilized to its maximum potential, will serve as an asset to the company, its stakeholders, and community. Strategic advisory board members provide resources that help create sustainability within the company by serving in the following capacities:

Part C.3.C.g. A list of current and proposed staffing including: i. Position, duties and responsibilities; Resume; and iii. Professional licensure disciplinary action in all jurisdictions

- Providing guidance and mentorship
- Networking with other business leaders
- Recommending and overseeing projects
- Providing access to needed resources
- Serving as back-up for existing job functions

Despite the many benefits, the strategic advisory board provides three main benefits to the company:

- Sustainability of the team – the board provides continuity to the company over the long term. The board also provides credibility to the company, making it easier to build stable partnerships and obtain funding.
- Expertise and advice – board members bring a wide range of backgrounds and real-world experience to the table which can be applied to situations faced by the company.
- Resources – In addition to their expertise and advice, board members can provide a wealth of other resources. Such resources include networking contacts, sponsorship, employment and volunteer experiences, access to facilities or equipment, and more.

Strategic advisory board members are key individuals who provide insight on operations and are a vital part of the success of the company. Strategic advisory board members are selected by the company's executive team and may include:

- Community leaders from business, educational, and civic organizations.
- Cannabis and healthcare industry experts and advocates.
- Active members from organizations such as the Chamber of Commerce, Rotary Club and Economic Development Groups.
- Local businesses with common stakeholders.
- Members of financial institutions or investment companies.

Currently, the advisory board serves three year terms for continuity in the beginning stages of the business and is scheduled to meet four times per year. The end of year meeting will be used to set goals and provide planning for the upcoming year.

The Chief Executive Officer will appoint a strategic advisory board coordinator to manage the communications and activities of the members. Required board activities include:

- Annual on-site meeting
- Quarterly teleconferences
- Review calls as needed

Part C.3.C.g. A list of current and proposed staffing including: i. Position, duties and responsibilities; Resume; and iii. Professional licensure disciplinary action in all jurisdictions

RESUMES/BIOGRAPHIES

Part C.3.C.g. A list of current and proposed staffing including: i. Position, duties and responsibilities; Resume; and iii. Professional licensure disciplinary action in all jurisdictions

Chief Executive Officer

ROBERT DUNSTAN WALLACE

15105 NW 94 Ave• Alachua, FL 32615
Phone: 352-219-5825 • E-Mail: chnuts@gmail.com

Education

Bachelor of Science with High Honors - University of Florida 1979 – Interdisciplinary Biology in Zoology, Wildlife Ecology and Botany with Minor in Agricultural Science.

Employment

- Founder and President, Chestnut Hill Tree Farm 1981-2015
- Founder and President, Chestnut Hill Outdoors (wildlife) 2012-2015
- Founder and President, Chestnut Hill Orchards (imported chestnut food products) 2012-2015
- Founder and President, Ponce Inlet Development 2004-2015
- Real Estate Broker, Coldwell Banker Commercial 2010-2015

Publications

- Chestnuts and Building a Commercial Chestnut Industry in the U.S. – authored or consulted on more than 100 publications in various horticultural journals – The Chestnut Grower, Northern Nut Growers Association, Pomona (North American Fruit Explorers), multiple national magazines including Whole Earth News, Mother Earth News, American Fruit Grower, Nursery Manager, etc 1985-2015
- Authored or consulted on 50+ articles in national newspapers on chestnuts – New York Times, Washington Post, etc
- Authored or consulted 20+ publications on Oriental Persimmons – various journals 1990-2015
- Editor Chestnutworks, publication of the Chestnut Growers of America 1985-1992
- Editor and Symposium organizer, Chestnuts and Creating a Commercial Chestnut Industry in the U.S. Symposium of the First International Chestnut Industry Conference, Morgantown WV 1987
- An Introduction to Production, Marketing and Economics of Growing Chestnuts in the SE United States. R.D. Wallace and Dr. PJ Van Blokland. Staff Paper 354. Food and Resource Economics Dept, Institute of Food and Agricultural Sciences, 1989

University of Florida

- Chestnuts - The Best Food Plot Tree – authored or consulted 20+ articles for multiple hunting magazines – North American Whitetail, Bowhunting, Deer and Deer Hunting, Quality Whitetails, Wildlife Management News, Peterson's Bowhunting, etc — 2012-2015

Research Experience

- USDA SBIR Research Grant – Clonal Rooting in Chestnut — 1995
- Bird Species Populations and Island Biogeography in Habitat Islands in North Florida – Florida Game and Fish Commission — 1979-1980

Patents & Trademarks

- U.S. Plant Patents for Revival Chestnut, Willamette Chestnut, Carolina Chestnut and Heritage Chestnut – personally wrote the only patents ever given to Chestnut tree varieties — 1987-1990
- multiple Trademarks including: Dunstan Chestnut ™, Chestnut Magic ™, Our Nuts are Bigger ™, Freedom Flowering Pear ™

Seminars and Media Experience

- How to Attract Deer with Food Plot Trees - Quality Deer Management Association – has done multiple presentations for seminars and Deer Steward Management classes, Archery Trade Association, etc. — 2013-2015
- International Plant Propagation Society – presentations on propagation of hard-to-root tree species — 1998-1999
- 20+ TV appearances on Planting Trees to Attract Wildlife with Food Plot Trees – North American Whitetail TV Show, Whitetail Properties TV Show, Gamekeepers, Woods and Waters TV, Fish and Game TV, etc — 2013-2015
- TV Commercials on Sportsmans Channel, Outdoor Channel, Pursuit Channel

Customers for Trees and Chestnut Products

- For Trees - Walmart, Lowes, The Home Depot, Rural King, Farm King, Co-op Feed Dealers, Stark Bros, etc — 1994-2015
- For Chestnut Magic – Walmart, Cabelas, Tractor Supply, Rural King, Farm King, Mills Fleet Farm, Co-op Feed Dealers, etc
- For Chestnut Food products – Whole Foods Market, United Natural Foods, small gourmet food stores and manufacturers

Affiliations/Memberships

- Chestnut Growers of America (Founder and Board of Director) — 1983-2015
- North American Fruit Explorers — 1983-2015
- Northern Nut Growers Association — 1983-2015
- International Plant Propagation Society — 1994-2002
- Florida Nursery Growers and Landscape Association — 1983-2015
- PK Yonge Developmental Research School Board of Trustees (Founder) — 1995-2014
- Gainesville Community Redevelopment Association Board of Advisors — 2012-2014
- Gainesville Area Innovators Network
- Emergent Growth II Angel Investment Fund, Gainesville FL

Real Estate Development Projects

- Red Oak Estates Subdivision, Alachua FL
- Progress Plaza, Alachua FL
- 1310 Retail Center, Shands Hospital, Gainesville FL

- North Causeway Offices, New Smyrna Beach FL
- Palm Ridge Plaza, The Villages, FL
- Sabal Palm Plaza, The Villages, FL

Interests

- Birding – 790 species seen in North America and 2500 species seen worldwide
- Sport Fishing and Fly Fishing
- Photography
- Travel
- Black Belt in Aikido

Deborah Gaw

15105 NW 94th Ave., Alachua, FL 32615
352-246-3045
dgaw55@msn.com

Professional Profile

Co-owner and CFO of Chestnut Hill Tree Farm, a leader in FL's wholesale tree industry and producer/distributor of a unique line of specialty fruit and ornamental trees for the Southeastern United States since 1983. Experienced horticulturist with a diverse knowledge of plant propagation, production, nutrition and pest management systems. Educator of growing specialty fruit and nut crops throughout the US. Ties with the University of Florida's Environmental Horticulture Department and Fruit Crops Department.

Professional Experience

1986-Present

Built CHTF from its inception in 1983 into one of Florida's leading tree farms.

- Established production systems for bare-root and container grown crops
- Established propagation systems, including seed, cutting and grafting propagation, maintenance of stock material and seed collection
- Introduced a unique cultivar of chestnut tree, which established a new nut crop in the US,along with a number of new fruit and nuts crops. Educates orchardists on crop production and management
- Coordinates retail and wholesale mail order business
- Handled logistics and distribution to large wholesale nursery accounts
- Assists in sales and advertising campaigns
- CFO in charge of all accounting and bookkeeping functions including accounts payable and receivable, tax preparation
- Handles HR and payroll
- Purchaser of equipment and supplies
- Works in cooperation with management and production team to achieve production and sales goals

1983-1986

Biological Assistant, Dept. Of Environmental Horticulture, Univ. of Florida

- Conducted research on post-harvest physiology of a variety of key economic flowering crops, such as poinsettias, azaleas and chrysanthemums for the flora cultural industry
- Knowledge of growing environmentally-controlled flowering crops and researching cultural conditions affecting their longevity, such as lighting, fertilizer and watering regimes
- Statistical analysis of data
- Trained in electron microscopy techniques
- Studied plant breeding
- Knowledge of plant growth regulators and their effects on plant production

1979-1983

Biological Assistant, Dept of Environmental Horticulture, Univ. of Florida

- Managed the Department's Plant Tissue Analysis Laboratory
- Prepared plant leaf samples and reagents under sterile conditions
- Performed nitrogen analysis using kjeldahl extraction method
- Operated and maintained atomic mass spectrometer for micro analysis of key nutritional elements
- Managed a staff of laboratory assistants
- Assisted staff and graduate students in various departmental research projects
- Purchased laboratory supplies/gases and equipment

Education 1976-1978

B.S in Agriculture, University of Florida, Dept. Of Environmental Hort.

1973-1975

Rollins College, pre-med program

Affiliations Chestnut Growers of America

Northern Nut Growers

North American Fruit Explorers

Florida Nursery Growers and Landscape Assoc.

Florida Pomegranate Assoc.

International Plant Propagators Society

Personal Edible Gardening/Cooking

Working Out/Running/Hiking

Traveling the world

SUSAN L. BAUMGARTNER, PHARM.D., MBA

2528 NW 138th Terrace • Gainesville, Florida 32606
678-602-5701 • susan.l.baumgartner@gmail.com

PROFILE

Accomplished business executive with expertise in the successful development and commercialization of pharmaceutical products and medical devices. Outstanding leader and strong performer in all educational and professional endeavors with demonstrated success across key positions within a top-tier pharmaceutical company and technology startups. Excellent communicator with a unique balance of scientific and business expertise, and exceptional active listening and analytical skills. Proven ability to maximize the performance of brands, organizations, operations, and people. Trusted advisor for executive teams, clients, strategic partners, colleagues, advisors, and board members. Breadth of expertise in strategic planning, business development, sales, marketing, operations, regulatory affairs, product development, project management, medical strategies, and scientific affairs. Deep ties to the University of Florida, and engaged in programs to support technology licensing and advancement of technology startups. Dedicated to the successful commercialization and adoption of innovation that makes a difference in health care.

PROFESSIONAL EXPERIENCE

INDEPENDENT CONSULTANT — 2015 – Present

XHALE, INC. — 2011 – 2015

Vice President of Business Development, Gainesville, FL (2011 – 2015)
Key member of the Executive Management Team for Xhale, a privately-funded startup and emerging leader in health monitoring technologies, reporting directly to the CEO and then to the President of Xhale Smart, a wholly-owned subsidiary. Responsible for developing and commercializing an innovative breath-based medication adherence monitoring system.

- Developed corporate strategy and product strategy for a novel medication adherence monitoring technology, and played an instrumental role in moving the company from an idea to a viable business operation.
- Negotiated collaborative development agreements with a top-tier pharmaceutical client resulting in strategic funding, and extracted significant value from this partnership.
- Initiated and developed a critical strategic alliance with a global leader in pharmaceutical formulations and manufacturing.
- Managed regulatory affairs, and led efforts with the U.S. FDA to identify and pursue efficient regulatory pathways for the system consisting of a food additive for inclusion in a pharmaceutical dosage form and a monitoring device for home use.
- Orchestrated sales, marketing, scientific communications, corporate relations, and Advisory Board activities to achieve business, financial, product development, market development, and client goals.
- Engaged pharmaceutical companies, contract research organizations (CROs), the National Institutes of Health (NIH), key opinion leaders, and clinical research service providers to accelerate adoption of the system and accomplish business goals.
- Made pivotal strategic and tactical decisions with respect to business planning, product development, client engagement, regulatory strategy, clinical studies, and pipeline investments that laid the foundation for company growth.

eTECT, LLC — 2010 – 2011

Commercial Lead, Roswell, GA (2010 – 2011)
Senior Commercial Leader for development-stage company with responsibility for orchestrating business development and customer engagement efforts. Developed and implemented strategic and tactical plans to bring to market an innovative medication adherence monitoring system that uses wireless ingestible sensors and a novel in vivo communications platform.

MERCK & COMPANY, INC., UNITED STATES HUMAN HEALTH DIVISION — 1996 – 2010

Senior Director of Commercial Operations, Southeast Commercial Operations Group, Atlanta, GA (2008 – 2010)
Senior Sales Leader with responsibility for directing commercial operations in South Carolina, Western North Carolina, and the Northeast Coast of Georgia. Successfully managed a portfolio of prescription medications in the asthma, allergic rhinitis, diabetes, hypertension, and migraine markets with profit and loss responsibility, annual sales objective of $144 million, and annual operating budget of $8.7 million. Led, coached, and managed a team of two Medical Group Account Managers, four Customer Team Managers, and 48 Customer Representatives.

- Designed new organizational structure and implemented customer-centric commercial model that resulted in 2009 portfolio performance of 102.4% of planned sales objective and #1 Southeast rank on portfolio business results.
- Significantly increased customer trust and value scores, employee engagement scores, and Region culture scores.
- Developed commercial strategy for the Region that streamlined operations, improved productivity, enhanced quality of customer interactions, fostered internal integration, and capitalized on growth opportunities.

MERCK & COMPANY, INC., UNITED STATES HUMAN HEALTH DIVISION

Senior Business Director, **Southeast Business Group,** Atlanta, GA (2006 – 2008)
Senior Sales Leader with responsibility for achieving financial goals, managing customer relationships, and launching three new primary care products in diverse markets within Tennessee, Kentucky, West Virginia, North Carolina, and South Carolina. Successfully managed a portfolio of prescription medications in the asthma, allergic rhinitis, and diabetes markets, as well as vaccines for the prevention of cervical cancer, genital warts, and herpes zoster. Led, coached, and managed a team of eight Business Managers and 92 Sales Representatives.

- Outperformed Fortune 500 best-in-class coaches and Merck peers on coaching effectiveness score.

Director, Strategic Planning and Support, Southeast Business Group, Atlanta, GA (2005 – 2006)
Developed strategic plans for the Southeast Sales Team in partnership with the Vice President and Senior Business Directors to drive annual revenue of $2.4 billion and long-term growth. Provided analytical, operational, and decision support that informed key decisions related to sales strategy, operational excellence, performance management, and resource allocation. Led team of four Region Analysts and one National Technical Analyst. Served as Lead Planner for the diabetes franchise.

Business Manager, Southeast Business Group, Boca Raton, FL (2002 – 2005)
Sales Manager with responsibility for achieving financial goals and managing customer relationships in the dynamic South Florida market. Successfully managed a portfolio of prescription medications in the osteoporosis, asthma, allergic rhinitis, arthritis, analgesia, and dyslipidemia markets. Led, coached, and managed a team of 14 Sales Representatives.

- Achieved final-year performance in the top 10% of Business Managers in the United States.
- Earned 2005 Special Achievement Award for Outstanding Leadership and 2004 Quality Customer Selling Award.

Senior Manager, Medical Strategies Group, Upper Gwynedd, PA (2001 – 2002)

Marketing Manager, Analgesic/Anti-inflammatory Therapeutic Business Group, Upper Gwynedd, PA (1999 – 2001)

- Earned Marketer of the Year, Best Customer Program, Customer Focused, and Field Favorite Awards.

Project Manager, Market Integration Team for VIOXX, West Point, PA (1998 – 1999)

Launch Manager, Market Integration Team for PROPECIA, West Point, PA (1997 – 1998)

- Earned Vice President's Distinguished Service Award.

Cardiovascular Consultant, Southeast Business Group, Jacksonville, FL (1996 – 1997)

EDUCATION

Doctor of Pharmacy, Highest Honors, University of Florida, 1996
Master of Business Administration, University of Florida, 1996

- Perry A. Foote Award for Distinguished Scholarship (Top Graduate in the Doctor of Pharmacy Program)
- Searle Fellowship in Pharmacy, First Place in National Competition
- University of Florida President's Recognition of Outstanding Students Award
- Rho Chi Pharmacy Honor Society, President; Rho Chi Gene Gramling Award for Academics and Leadership
- Eli Lilly Award for Outstanding Leadership, Academics, and Extracurricular Activities
- American Pharmaceutical Association – Academy of Students of Pharmacy Mortar and Pestle Professionalism Award
- Beta Gamma Sigma Business Honor Society

PROFESSIONAL ACHIEVEMENTS

- Director, Xhale Smart Board of Directors (2012 – 2015)
- Co-inventor on provisional patent application for "Improved Self Monitoring and Reporting Therapeutics, SMART®, Medication Adherence Monitoring Method, Device, Compositions of Matter and System" (2014)
- Co-inventor on design patent application for "Miniature Portable Gas Chromatograph" (2013)
- Invited Mentor, Empowering Women in Technology Startups (Ewits®) Program (2012, 2013, 2015)
- Member, National Advisory Board for University of Florida College of Pharmacy (2008 – 2009)
- University of Florida Outstanding Young Alumni Award (2007)
- Commencement Speaker, University of Florida College of Pharmacy Graduation (2000)

R. Dunstan Wallace II Resume

- Graduated with Honors from Buchholz High School Finance Academy 2007
- President of Finance Academy
- Low Brass Captain Buchholz Wind Symphony and Golden Regiment Marching Band
- member of Phantom Regiment Drum Corps marching band summers 2007-2008-2009
- Bachelor's Degree from University of Florida Fisher School of Accounting in the Warrington College of Business Administration 2011
- Intern in Tax Accounting at Austin, Bovay and Gilman CPA - 2010
- Chestnut Hill Tree Farm – 2011-12 - build complete websites and set up shopping carts for www.chestnuthilltreefarm.com and www.chestnuthilloutdoors.com

- Set up Quick Books accounting for website businesses – complete knowledge of Quick Books accounting software 2011-12
- Staff Accountant, University of Florida Accounting Department, Grants Division 2013-14

Age 25.
In Europe for summer 2015, will return August and submit Level 2 Screen (no arrests or tickets).

Security Director

JOHN POWELL

649 WSETBROOK ROAD, DOTHAN, ALABAMA 36303/ 850-491-8886 / jrpowell@graceba.net/ LinkedIn

SUMMARY

An experienced law enforcement and public safety professional with a solid academic foundation who has progressively served at all levels with increasing responsibility and accountability gaining real life experience and professional training. This experience enables effective operations in planning, asset allocation, diversity/gender awareness, personnel management and negotiations, strategic planning, tactical response, organizing, recruiting, budgeting, succession planning and relationship building. Currently certified in Florida as a law enforcement officer.

PROFESSIONAL EXPERIENCE

2011-PRESENT

Law Enforcement, Public Safety/ Security and Management Consultant

Providing professional expertise in the area of law enforcement policy and procedure. Adviser in public safety and security matters. Partnering with the federal, state and local government agencies providing a deep understanding of the issues, organizational protocols and challenges that surround today's law enforcement decision makers. Providing a combination of management consulting, technical expertise, and operational knowledge of law enforcement, public security and management concepts.

- MARICOPA COUNTY, ARIZONA PROTECTIVE SERVICES DEPARTMENT - DIRECTOR. Provide guidance and direction in the operations involving security measures to protect county assets and the public from hostile acts. Provide dignitary protection to elected officials. 75 armed personnel with a $5mil operation budget.

- UNITED NATIONS/UNITED STATES DEPARTMENT OF STATE – Bureau of International Narcotics and Law Enforcement Affairs (INL)/INERNATIONAL POLICE-HAITI. Selected to serve as the US Law Enforcement Contingent Commander (Police Advisor Level V) by the US Department of State and United Nations. National representative of the contingent and, as such, liaise with United States and Haitian national authorities, when appropriate and if possible, on issues pertaining to the betterment of the mission. Responsible for operational control and strategic assignment of all US law enforcement personnel, supervising and managing 100 staff. Ensured all police advisors provide high quality service and conduct themselves in a professional and ethical manner. *U.S. Public Trust clearance required.

- TEXARKANA ARKANSAS SCHOOL DISTRICT INTERIEM SECURITY DIRECTOR to implement safe schools initiative and manage training of security professionals for the school district. Sworn as a Miller County, Arkansas Sheriff's Deputy.

- COMPUTER EVIDENCE SPECIALISTS (CES), Federal Grant assistance and implementation with US Food and Drug Administration.

- ENGILITY CORPORATION-LAW ENFORCEMENT PROFESSIONAL (LEP) – Afghanistan, provided investigative and law enforcement training to the US

Military and Afghanistan National Police. Managed field operations for LEPs. Required US Government Secret Security Clearance.

2009-2011

Director, *FLORIDA DEPARTMENT OF BUSINESS AND PROFESSIONAL REGULATION/Division of Alcoholic Beverages & Tobacco (ABT)*

The of Division of Alcoholic Beverages and Tobacco licenses the alcoholic beverages and tobacco industries, collects and audits taxes and fees paid by the licensees and enforces the laws and regulation of the alcoholic beverage and tobacco industry pursuant to Florida Statutes. Florida has approximately 75,000 active beverage and tobacco license holders. Sworn State of Florida Law Enforcement Position–executive appointment approved by the Governor. Directed the daily operations of three bureaus of the Division; Law Enforcement, Auditing and Licensing.

- Managed 13 statewide regional offices with 337 staff, 155 sworn law enforcement investigators and 182 civilian personnel. Closely developed, managed and monitored a divisional budget of $25 million dollars. Responsible for the collection and accountability of over $1 billion dollars in tax revenue. Ensured Division maintained all standards required for continued accreditation status through the Commission for Florida Law Enforcement Accreditation. Division re-accredited under my tenure.
- Award winning innovative use of technology achieving efficiency. 10% reduction in operational cost without reduction in services to the customer or reduction in staff.
- Served as **Deputy Secretary** for the Florida Department of Business and Professional Regulation under interim appointment, Governor-approved, (2010). Managed and supervised four regulatory agencies; Alcoholic Beverages & Tobacco; Timeshares & Mobile Homes; Hotels & Restaurants; Pari-mutuel Wagering.

1999-2009

Chief of Police

Planed, organized, and directed the law enforcement programs of the City. Work involved responsibility for the protection of life and property through varied programs of enforcement, detection and prevention of crime and traffic accidents, planning and directing emergency response activities. Work also involved a full managerial and supervisory role including the establishment of policy, evaluation and adherence to prescribed standards, planning for and implementing special enforcement activities, preparing special state, federal and local reports, analyzing crime and accident trends, cooperating with other law enforcement and local agencies, budget preparation and management and supervision of all department personnel. Work was performed in accordance with departmental policy and state and federal law.

City of Dothan, Alabama (2005-2009)

- Sworn State of Alabama law enforcement position – Municipal law enforcement department providing service to a diverse community of 67,000

residents. Department of 155 sworn staff and 100 non-sworn personnel providing professional staff to the Patrol, Criminal Investigations and Support Services Divisions. These functions included animal services, radio shop, city jail (129 inmate capacity), municipal court security and emergency communications center. $30 million dollar biennial budget.

City Wilson, North Carolina (2001-2004)

- Sworn State of North Carolina law enforcement position – Municipal law enforcement department providing service to a diverse community of 50,000 residents. Department of 120 sworn staff and 20 non-sworn personnel providing professional staff to the Patrol, Criminal Investigations and Support Services Divisions. $11 million dollar annual budget.

City Hartsville, South Carolina (1999-2001)

- Sworn State of South Carolina law enforcement position – Municipal law enforcement department providing service to a diverse community of 8,000 residents. Department of 40 sworn staff and 10 non-sworn personnel providing professional staff to the Patrol, Criminal Investigations and Support Services Divisions. $2 million dollar annual budget.

Implementation of crime reduction programs such as; National Night Out (National Award winner), Sexual Offender Accountability Program (S.O.A.P.) and Data-driven intelligence led policing using crime analysis and monitoring to identify crime trends and hot spots. Implemented foot and bicycle patrols. Launched departmental accreditation efforts through the Commission on Accreditation for Law Enforcement Agencies (CALEA).

1983-1996 **SWORN LAW ENFORCEMENT OFFICER**

- FBI Special Agent (1996-1999) assigned to white collar crime investigations, violent fugitive felon investigations, and narcotic crimes and served as law enforcement liaison.

- Escambia County Florida Sheriff's Office (1983-1996) served as Corrections Officer, Patrol Officer, Narcotics Investigator, Field Training Officer, Property and Persons Crime Investigator, Robbery and Homicide Investigator. Sheriff's supervisor, SWAT operator / team leader.

EDUCATION | CURRENT CERTIFICATIONS

1994 MS, Public Administration, *Troy University*

1992 BS, Criminal Justice/minor in Business, *Troy University*

1990 AS, General Studies, *Troy University*

Florida Law Enforcement Certification (current); Florida Certified Insurance Adjuster (current). Previous Adjunct instructor in Criminal Justice and Management – George Stone Technical School (Florida law enforcement academy), Texas A&M, Coker College, Hartsville, S.C., Florence/Darlington Technical College, S.C., Barton College, Wilson, N.C., and Troy University, Dothan, AL.

PROFESSIONAL TRAINING:

FBI Academy (96–19); FBI Law Enforcement Executive Development Seminar (LEEDs Session 59); FBI Southeastern Law Enforcement Executive Development Seminar; FBI Carolina Command College; Florida Department of Law Enforcement Chief Executive Seminar (FDLE) (Class 43); Anti-Defamation League (ADL) Advanced Training; University of Virginia Weldon-Cooper Center for Public Service Senior Executive Institute (SEI); University of Arkansas Rural Executive Management Institute; NIMs certifications; Incident Command (ICS); Emergency Management.

CODI COLEMAN

odicoleman4@gmail.com

Summary:

I have been working with and growing cannabis for six years. During the first three years, I had the opportunity to work under several mentors while maintaining large-scale outdoor grow sites. Additionally, I have managed multiple departments in cultivation and processing facilities, managing and directing employees and overseeing all aspects of day-to-day operation. In the past three years, I have become self-employed by maintaining patients and owning and operating a private medical cultivation facility.

Education:

I have attended the cannabis-affiliated Oaksterdam University, where I graduated from both the basic and advanced seminars.

Summary of Skills:

- Cannabis garden design, set up and irrigation
- In house propagation, maintaining a stock plants as well as taking clones or cuttings.
- Selective breeding processes
- Nutrients and additives to promote vegetative and flower growth, I prefer using only organic materials in my garden.
- Recognizing pests and diseases common to cannabis plants and how to combat them.
- Constructing a light deprivation house to produce off season crops or use supplementary lights to prolong the vegetation period.
- Multiple pruning, trellising and training techniques.
- Tagging and labeling everything from seed to harvest.
- Good agricultural practices including not over fertilizing or stripping the mineral content from the surrounding land.
- The microbial life needed to promote healthy soil food web
- Organic chemistry of cannabis and cannabinoids.
- Multiple forms of cannabinoid extractions, one in which I excel is butane extraction producing a pristine glass like product.
- Also I have recently started a medical and recreational cannabis garden consultation business, Simple Leaf Solutions LLC, where I assist new comers with design, set up, maintenance and harvest.

Richard Tempel, MD, FACEP. FAAEM

1350 Celebration Avenue
Celebration, FL 34747
407-756-3717
drtempel@gmail.com

EDUCATION

2003 – 2006	Duke University Emergency Medicine Residency Program, Chief Resident
1999 – 2003	University of Maryland School of Medicine, Medical Doctorate
1996 – 1999	University of Maryland College Park, Bachelors of Science in General Biology
1994 – 1996	Towson University, premedical curriculum

EMPLOYMENT

November 2008 – present	Florida Emergency Physicians Ultrasound Coordinator, Florida Hospital Celebration 2009-11
June 2006 – November 2008	Emergency Physician, Saint Joseph Medical Center, Towson, MD Osler Drive Emergency Physician Asociates (ODEPA)
November 2006 – Nov 2008	Emergency Physician, Ultrasound Director Upper Chesapeake Health System

ACADEMIC APPOINTMENTS

Clinical Preceptor, Broward Health/NOVA Family Medicine Residency Program
University of Central Florida (UCF), College of Medicine, volunteer faculty

LICENSURE AND CERTIFICATIONS

American Board of Emergency Medicine (ABEM), June 2007
State of Florida Medical Licensure
Aesthetic Medical Educators Training, Inc., Botulinum Toxin and Dermal Fillers

PUBLICATIONS

1999 Teleradiology in urology: effect of varying compression algorithms on clinical decision making. Abstract. Engineering and Urology Society 14th Annual Meeting. Dallas, TX.

2006 *Infectious Disease in a disaster zone*. Disaster Medicine. Ciottone editor. Section 4, Chapter 46. Mosby. March 2006. ISBN:0323032532

2006 Proposing short-term observation for the disposition on patients with decompression illness; UHMS, Vol 35, No 2, June 2006.

AWARDS AND HONORS

Chief Resident, Division of Emergency Medicine, Department of Surgery, DUMC, 2005-06
Graduating Resident of the Year 2006, Duke University Medical Center
Teaching Resident of the Year, 2006, Duke University Medical Center
Golden Key National Honor Society, University of Maryland College Park, 1998-99
Citation in Archaeology, University of Maryland College Park, 1999

LECTURES/PRESENTATIONS

1/8/2015 - *Controlled Dangerous Substances and Medicinal Marijuana*. Celebration, FL
6/25/2009 – *Allergy and Anaphylaxis.* Florida Emergency Medicine Residency Conference. Orlando, FL
5/28/2009 – *Electrolyte Disorders*. Florida Emergency Medicine Residency Conference. Orlando, FL
11/22/2008 – *Introduction to Emergency Ultrasound.* Lecture, 2008 Radiology Forum, Upper Chesapeake Medical Center. Bel Air, MD
1/ 2005 - Instructor, Duke University Physician Assistant Program, Lecture titles, *Shock* and *ENT Emergencies.*
June 2005/2006 - Disaster Planning Coordinator/Group leader, Duke University Disaster Medicine Intercession, Table top coordinator.
10/18/2004 - ACEP Scientific Assembly; San Francisco, CA. Proposing short-term observation for the disposition of patients with decompression illness: abstract.
3/1/2004 - National Association of Community Health Centers Inc. 2004 Community Health Forum; Orlando, FL. Titles; 'The Importance of Preventive Medicine' and 'Americorp Career Fair: Medicine'

PROFESSIONAL ORGANIZATIONS

Fellow of the American College of Emergency Physicians (ACEP), Florida Chapter
Fellow of the American Academy of Emergency Medicine (AAEM)
American Medical Association, Florida Chapter (FMA)

Curriculum Vitae
Lawrence B. Erlich, M.D.

Lawrence B. Erlich, M.D.

1530 Celebration Blvd.
Suite 406
Celebration, Florida 34747

(407) 852-8882
(407) 830-5252

Specializing in:

General,
Forensic
and
Addiction
Psychiatry

CERTIFICATIONS:

1974 - American Board of Psychiatry and Neurology and Psychiatry
1990 - American Board of Quality Assurance and Utilization Review Physicians
1991 - American Society of Addiction Medicine
1993 - Medical Review Officer Certification Council
1994 - American Board of Psychiatry and Neurology added Qualifications in Forensic Psychiatry
Re-certified 2007
1996 - American Board of Psychiatry and Neurology added Qualifications in Addictions Psychiatry
Re-certified 2007
2001 - Substance Abuse and Mental Health Services Administration federal waiver to prescribe Suboxone
2007 - Re-certification in Forensic Psychiatry and Addiction Psychiatry

FELLOWSHIPS:

1977 - Distinguished Life Fellow of the American Psychiatric Association
1978 - Fellow-American Academy of Forensic Sciences
1988 - Fellow-American College of Medical Quality

ACADEMIC APPOINTMENTS:

1994 - 1996 - Professor of Criminal Justice and Legal Studies at the University of Central Florida
1979 - 1987 - Clinical Assistant Professor of Psychiatry, Robert Wood Johnson Medical School, Piscataway, New Jersey

AWARDS:

1959 - Phi Beta Kappa Academic Honor Society
1963 - Alpha Omega Alpha Medical Honor Society
1971 - Henry P. Laughlin Award for being the
1976 - Award for Service
1982 - Award of Merit
1983 - Award of Merit
1987 - Award for Service
1995 - Award for Service from the Altamonte Springs, Florida Police
2000 - Award for Honorable Mention from the American Psychiatric Association for the 2000 Newsletter of the Year Award competition for the Newsletter of the State of Louisiana

PROFESSIONAL SOCIETIES:

1976 – 1979 - President, South Jersey Psychiatric Association
1978 - 1979 - Chairman, Psychiatric Section, American Academy of Forensic Sciences
1979 – 1981 - Executive Committee, American Academy of Forensic Sciences
1973 - 1982 - Numerous Committees of the New Jersey Psychiatric Association as member and chairman
1977 - 1979 - Secretary, New Jersey Psychiatric Association
1979 - 1980 - Executive Committee, Camden County Medical Society
1979 - 1981 - Vice President for Internal Affairs, New Jersey Psychiatric Association
1981 - 1982 - President Elect, New Jersey Psychiatric Association
1982 - 1983 - President, New Jersey Psychiatric Association
1988 - Present - Member of The American Society of Addiction Medicine
1988 - Present - Fellow of the American College of Medical Quality

CHRONOLOGY :

1955 - 1959 - B.A. in Chemistry, College of the University of Pennsylvania, Philadelphia, Pennsylvania
1959 - 1963 - M.D., Medical School of the University of Pennsylvania, Philadelphia, Pennsylvania
1963 - 1964 - Internship, Kings County Hospital, Seattle, Washington

1964 - 1965 - Residency in General Practice, Mountain View General Hospital, Tacoma, Washington
1965 –1966 - Attending, Student Health Service, University of Florida, Gainesville, Florida
1966 - 1968 - United States Navy - General Medical Officer
1968 – 1971 - Residency in Psychiatry, Institute of the Pennsylvania Hospital, Philadelphia, Pennsylvania
1976 – 1977 - Special Fellowship in Forensic Psychiatry, University of Pennsylvania, Philadelphia, Pennsylvania
1971 - 1987 - Private Practice of Psychiatry Philadelphia, Pennsylvania and Cherry Hill, New Jersey
1983 - 1984 - Attending, The New Jersey Hospital for the Criminally Insane, Vroom Building, Trenton, New Jersey
1987 - 1989 - Florida Psychiatric Associates, Winter Park, Florida
1989 – 1995 - Private Practice Altamonte Springs, Florida
2000 – 2002 - Behavioral Health, Winter Haven Hospital
1971 - Present - Private Practice of Addiction Medicine in Addiction Units (The Institute of the Pennsylvania Hospital and Florida Hospital) and in general hospital units (Our Lady of Lourdes Hospital and Cooper Hospital, Camden, New Jersey)
2011- Present - Founder and Medical Director of Comprehensive Behavioral Healthcare of Central Florida, Celebration, Florida

MEDICAL STAFF APPOINTMENTS :

1988 – 1995 - Consulting, Winter Park Memorial Hospital, Winter Park, Florida
1987 – 1995 - Attending Physician, Florida Hospital, Orlando, Altamonte Springs and Apopka
1971 – 1987- Attending, Our Lady of Lourdes Medical Center, Camden, New Jersey
1986 – 1987- Chief of Psychiatry, Our Lady of Lourdes Medical Center, Camden, New Jersey
1971 - 1987 - Attending, Institute of the Pennsylvania Hospital, Philadelphia, Pennsylvania
1973 - 1980 - Attending, Cooper Medical Center, Camden, New Jersey
1977 - 1979 - Acting Chief of Psychiatry, Cooper Medical Center, Camden, New Jersey
1975 - 1987 - Consultant, Deborah Heart and Lung Center, Browns Mills, New Jersey
1980 - 1982 - Consultant, The Forensic Hospital of the State of New Jersey, Vroom

Building, Trenton, New Jersey

1981 - 1985 - Consultant, St. Lawrence Rehabilitation Center, Lawrenceville, New Jersey

1986 - 1987 - Consultant, North Princeton Developmental Center, Skillman, New Jersey

1995 - 2000 - Attending, Baton Rouge Medical Center, Baton Rouge. Louisiana

1995 - 2000 - Meadow Wood Hospital, Baton Rouge, Louisiana

MEDIA APPEARANCES:

1988 to 1995 - Various appearances on various topics on local television news programs, Orlando, Florida

PUBLICATIONS: 1977-1993

1977 - 1979 - Editor of the Newsletter, New Jersey Psychiatric Association

1979 - Medical-Legal Digest for New Jersey Psychiatrists, New Jersey Psychiatric Association, Chapter 16 –Civil Rights of Mental Patients

1992 - November - Letter to the Editor concerning costly delays in the Workers' Compensation System

1987 - The New Jersey Trial Lawyer, Fall Issue –Psychic Trauma Secondary to the Death of a Child

1991 - The New Jersey Trial Lawyer, March Issue –Stress Management for Executives

1993 - Newsletter of the Florida Association of Self-Insured

PUBLICATIONS: SINCE 1997

1997 - July - Book Review of Karch, "The Pathology of Drug Abuse." Journal of Forensic Sciences, Volume 42, #4.

1997 - April - Book Review of Hickley, "Goodbye My Little Ones" AAAP Newsletter, Volume XII, #2,

1997 - September - Book Review of Sederer, "Outcomes Assessment in Clinical Practice, Journal of Forensic Sciences, Volume 42, #5.

1998 - Book Review of Elyn and Behnke, Jekyll and Trial, (Multiple Personality Disorder and Criminal Law), American Journal of Medical Quality, Volume 12, #1, Spring

1998 - November - Book review of Blane, Brunner, and Wilkinson, "Health and Social Organization" JAMA

1998 - National Institute on Drug Abuse

1999 - January - Book review of Wetherington, Cora Lee and Roman, Aeele B., Newsletter of the American Academy of Addiction Psychiatry

2001 - *A Textbook of Forensic Addiction Psychiatry and Medicine.* Erlich, Lawrence B., M.D., Charles C. Thomas, LDT. Springfield, Illinois

2004- April- JAMA Book review, Principals and Practice of Forensic Psychiatry, edited by Richard D. Rosner, Oxford University Press

PRESENTATIONS :

2001 - July 11-15, Employment Law Trial Skills, Stetson University College of Law, Office of Continuing Legal Education,

2001 - November 23, Certification of Instructor Approval, Florida Department of Insurance, #1076333/CE011

2002 - April 8 - 10, Florida Society of Addiction Medicine Annual Meeting, lecture on Forensic Addiction Medicine

2002 - June 14, The Academy of Florida Trial Lawyers, Lectures on the use of pain practitioners in trial law

2002 - July 7, American Society of Addiction Medicine, Course on Forensic Addiction Medicine, Lecture on Dr. Erlich's book

Brady Thomas Blake

T: 321-239-3162
E: bblake22@hotmail.com

Education

Bachelor of Science, Business Administration — Graduated August 2003
University of Central Florida, Orlando, Florida

Employment

3D Cannabis Center — 2014 - Present
-Facility Grow Manager

- Created procedures to increase and streamline production
- Trained new hires on proper inventory and storage practices

-Consultant

- Helped facilitate the transition to recreational sales
- Developed and trained processes to ensure compliance with city and state law

Colorado Alternative Medicine — **2010 - 2014**
-Senior Operations — 2013 - 2014
-Facility Manager/ Lead Grower — 2013 - 2014

- Implemented and managed daily processes and procedures for 240,000 watts of flower production
- Ensured all employees followed compliance guidelines provided by the MMED
- Inventoried and monitored 4,000 plants daily from clone to harvest using METRC tracking
- Increased production by 30%

-Quality Control/ Harvest Manager — 2010- 2014

- Trained and managed 5-15 trimmers
- Ensured all product was processed to the highest standard of quality
- Confirmed proper packaging, inventory and storage for 60-100lbs. of product monthly

-Lead Trimmer — 2010 – 2010

- Efficiently manicured high quality flower
- Recorded and informed management of daily production

E & A Enterprises — 2009
-Service Technician

- Restaurant equipment service and repair
- Gas, electric, plumbing, and general repair
- Maintained multiple T.G.I. Friday's restaurants in one of their largest markets.
- Provided around the clock emergency repair work

BAGS Inc. — **May 2005– Sept. 2008**
-Account Manager, Disney's All Star Resorts — Oct. 2007– Sept. 2008
Bell Services/ Resort Airline Check-in

- Upheld a seamless participant relationship with Disney management

- Trained and monitored guest service at all three All Star Resorts
- Collaborated with the Disney Magical Express team, major airlines and airports to recover lost luggage
- Completed weekly schedules for 50-60 employees
- Coordinated arrival and departure assistance for many large groups

-Account Manager, Disney's Pop Century Resort Jan. 2007– Oct. 2007
Bell Services/ Resort Airline Check-in

- Initiated and led the luggage department upon BAGS Inc. becoming a Disney participant
- Trained and placed opening team
- Maintained a staff of 2-3 shift managers and 40 employees

-Area Manager, Disney World Resorts Sept. 2005 – Jan. 2007
Resort Airline Check-in

- Managed several zones at all 19 Disney World Resorts
- Traveled six weeks to Denver to assist in opening two remote airline check-in stations at the Hyatt Regency & Grand Hyatt

-Ground Security Coordinator, Disney's Animal Kingdom Lodge May 05'–Sept. 05'
Resort Airline Check-in

- Supervised daily operation
- Ensured all agents followed Security Directives provided by the TSA

Hollister Co. Feb. 2004 - April 2005
-Assistant Store Manager, Altamonte Mall

- Brought store to a regional low shrink rate of 1.6%
- Traveled to provide support for stores in Ocoee, Naples and Tampa, Florida
- Recruited staff and held group interviews

Achievements

Vice President of Recruitment, Sigma Phi Epsilon Fraternity Fall 2000 – Spring 2001
Dean's List, University of Central Florida
Intramural Champion UCF: flag football, soccer, softball, & floor hockey

Samuel Glucksman, DPM

Samuel Glucksman, DPM, the crop management specialist and primary account manager at Glades Crop Care, Inc. currently directs all cultivation operations for the East coast and Homestead divisions. With an extensive educational background in horticulture, receiving a B.S. in botany and PhD in plant medicine from the University of Florida, his continuing experience in the agriculture industry has led him to be a skilled expert and frontrunner in the cultivation and research of diverse plants. He has successfully developed detailed protocols for company operations from diligent field research, providing growers with the best possible organic and conventional recommendations to solve pest, disease, and cultural issues (i.e. pesticide application, etc.). He has directed environmental controls and pest management, providing help to individual's growing issues. Additionally, Dr. Glucksman is an expert in good agricultural practices, and heads the human resources, administrative, and customer service departments at Glades Crop Care, Inc.

A seasoned and researched cultivator and superintended in the horticulture industry, Dr. Glucksman's successful career has provided him with vast regional knowledge. Dr. Glucksman is considered a leader in the agriculture industry in Florida resulting from years of research and experience growing and harvesting crops in the State. His roles in the industry have ranged from a field technician and graduate assistant at the University of Florida, to the assistant field studies coordinator and crop management specialist at Glades Crop Care, Inc.

Dr. Glucksman's established knowledge and long-term involvement in the scientific field enables him to bridge production optimization and research enhancements in plant medicine to the cannabis cultivation industry. Years of progressive experience in the field cause Dr. Glucksman to bring valuable scientific research and advisory services to the company. Dr. Glucksman will be an important asset in the development of the company's fundamental and compliant production practices.

Kristopher M. Palmer

1424 S Urban Way
Lakewood, CO 80228
Phone: (407) 341-8049
E-mail: kpsurfer20@aol.com

Summary

I have built and operated gardens from single warehouse sites up to a 190,000 watt operation with two different production sites, totaling approximately 18,000 sq. ft. I have over 13 years experience with hydroponics such as deep-water culture, flood and drain, top feed and nutrient flow technology. The typical mediums used have been coco, soil, rock wool and grow stones. I also have over 5 years experience with aeroponics and commercial growing operations in Colorado. Thru the years, I have had the ability to consult multiple other gardens. I believe these experiences have helped broaden my understanding of efficiently designing a system based on the building setup. I have had the advantage of helping multiple gardens deal with costly problems that could have been avoided by proper setup and design. My most valuable assets are my knowledge of costs associated with the industry and the ability to design a production facility that also focuses on the reduction of man hours and efficiently staging of materials for the various stages of growth. I have been in the construction industry for over 18 years, which allows me to bridge a major gap between builders and what growers actually need.

Education

University of Central Florida	Orlando, Florida
Bachelor of Science:	Business Administration
Major: Finance	Minor: International Business
Graduated May 2004	Member of Golden Key Honor Society

Licenses/Certifications

Florida Real Estate License

Infrared Training Center-Nationally Certified Thermographer

Professional Experience

THConsulting **2010-Present**
Owner

- Provide services to the rapidly growing medical cannabis industry from state and local application work and cultivation design to build outs and operational staffing and training
- Working with Denver Water and the Denver Department of Environmental Health to develop a best practice guide for commercial cannabis cultivation
- Application of thermal imaging to improve garden and building efficiencies
- Regular participant in control experiments to test various fertilizers on cannabis, both organic and synthetic
- Thousands of hours and dollars in product testing and product development specific to indoor cultivation and hydroponics
- Developed an integrated pest management program over 5 years of commercial cannabis cultivation, updating the program every few months for pests and diseases typical to cannabis, as new products and information become available

3D Cannabis Center **2013-2015**
Investor/Head Grower/Facility Manager

- Created an employee manual specific to the commercial cannabis industry
- Created a cultivation training manual for employees specific to indoor hydroponic systems with a focus on sanitation, grow medium preparation and production planning
- Streamlined inventory ordering and incorporated regular bi-weekly material deliveries reducing the inventory storage area and man hours associated with acquiring necessary cultivation materials
- Increased the indoor production/cultivation area by 100% in less than 10 months
- Increased production by over 300% in less than 12 months
- Increased staff from 5 to 35 employees in 8 months
- Increased sales from $30,000 to $300,000 per month in 8 months
- Responsible for working with the City of Denver's Building and Zoning Department in securing the 7th recreational license awarded in Colorado which resulted in America's first recreational sale

Colorado Alternative Medicine **2010-2013**
Head Grower/Facility Manager

- Hired as the first cultivation employee/manager with the full responsibility of the development of the cultivation department
- Developed commercial hydroponic systems designed for automation, man hour reduction and ease of operation
- Designed and built all production rooms throughout a multiple warehouse cultivation expansion
- Increased production by over 400% in a 2 ½ year period
- Created processes and procedures for daily operations and production planning
- Created training methods to organize and streamline production methods
- Trained management in equipment diagnostics and general system troubleshooting
- Performed evaluations, data collection and analysis of over 150 varieties of cannabis over a 3 year period

Absolute Property Managers **2008-2009**
Owner

- Managed and maintained residential and commercial properties
- Performed basic services all the way to whole house remodels
- Performed thermal energy efficiency evaluations on residential homes
- Incorporated use of the thermal camera to effectively provide condition monitoring of commercial electrical and mechanical systems

E & A Enterprises **2006-2009**
Service Technician

- Repaired and serviced restaurant equipment
- Repaired gas, electric, plumbing, and miscellaneous issues
- Maintained multiple T.G.I. Friday's restaurants in one of their largest markets
- Provided around the clock emergency repair work

O2HR Human Resources **2004-2005**
Account Executive

- Outside Sales- position was to seek out and obtain a new book of business through cold calls and creative marketing
- Customer Sales- provided after the sale service to maintain client base and improve on referral business

Construction Experience

Nationally Certified Thermographer **6 years**

- Scanned and identified heat losses and heat sources
- Scanned electrical systems to ensure safe operating conditions
- Performed air flow calculations
- Performed building energy efficiency evaluations and condition monitoring of mechanical systems

Restaurant Repair/Property Management/General Contractor **18 years**

- Commercial gas line repair
- Metal working/Fabrication experience
- Carpentry experience
- Plumbing experience
- Commercial electrical experience
- A/C & Ventilation experience

This Consulting Agreement, dated effective March 1, 2015 (this “Agreement”), is made and entered into by and among Chestnut Hill Tree Farm (the “Company”) and From Seed (the “Consultant”).

ARTICLE 1 SCOPE OF WORK

1.1 Services. The Company has engaged Consultant to provide services in connection with the Company’s application for low THC cannabis and facility design and operation. Consultant will initially provide content necessary for the Florida application. We will use our collective experiences to add detail to the cultivation plan and assist in equipment selection and design.

1.2 Time and Availability. Consultant will devote the time necessary to assist in the application process for the Company as stated herein. Consultant shall have discretion in selecting the dates and times it performs such consulting services giving due regard to the needs of the Company’s business.

1.3 Confidentiality. In order for Consultant to perform the consulting services, it may be necessary for the Company to provide Consultant with Confidential Information (as defined below) regarding the Company’s business and products. The Company will rely heavily upon Consultant’s integrity and prudent judgment to use this information only in the best interests of the Company.

1.4 Standard of Conduct. In rendering consulting services under this Agreement, Consultant shall conform to high professional standards of work and business ethics. Consultant shall not use time, materials, or equipment of the Company without the prior written consent of the Company. In no event shall Consultant take any action or accept any assistance or engage in any activity that would result in any university, governmental body, research institute or other person, entity, or organization acquiring any rights of any nature in the results of work performed by or for the Company.

1.5 Reports. Consultant shall periodically provide the Company with written reports of his or her observations and conclusions regarding the consulting services. Upon the termination of this Agreement, Consultant shall, upon the request of Company, prepare a final report of Consultant’s activities.

ARTICLE 2 INDEPENDENT CONTRACTOR

2.1 Independent Contractor. Consultant is an independent contractor and is not an employee, partner, or co-venturer of, or in any other service relationship with, the Company. The manner in which Consultant’s services are rendered shall be within Consultant’s sole control and discretion. Consultant is not authorized to speak for, represent, or obligate the Company in any manner without the prior express written authorization from an officer of the Company.

2.2 Taxes. Consultant shall be responsible for all taxes arising from compensation and other amounts paid under this Agreement, and shall be responsible for all payroll taxes and fringe benefits of Consultant’s employees. Neither federal, nor state, nor local income tax, nor payroll tax of any kind, shall be withheld or paid by the Company on behalf of Consultant or his/her employees. Consultant understands that he/she is responsible to pay, according to law, Consultant’s taxes and Consultant shall, when requested by the Company, properly document to the Company that any and all federal and state taxes have been paid.

2.3 Benefits. Consultant and Consultant's employees will not be eligible for, and shall not participate in, any employee pension, health, welfare, or other fringe benefit plan of the Company. No workers' compensation insurance shall be obtained by Company covering Consultant or Consultant's employees.

ARTICLE 3 COMPENSATION FOR CONSULTING SERVICES

3.1 Reimbursement. The Company agrees to reimburse Consultant for all actual reasonable and necessary expenditures, which are directly related to the consulting services. These expenditures include, but are not limited to, expenses related to travel (i.e., airfare, hotel, temporary housing, meals, parking, taxis, mileage, etc.), telephone calls, and postal expenditures. Expenses incurred by Consultant will be reimbursed by the Company within 15 days of Consultant's proper written request for reimbursement.

ARTICLE 4 TERM AND TERMINATION

4.1 Term. This Agreement shall be effective as of March 1st, 2015, and shall continue in full force and effect for 12 consecutive months. The Company and Consultant may negotiate to extend the term of this Agreement and the terms and conditions under which the relationship shall continue.

4.2 Termination. The Company may terminate this Agreement for "Cause," after giving Consultant written notice of the reason. Cause means: (1) Consultant has breached the provisions of this Agreement in any respect, or materially breached any other provision of this Agreement and the breach continues for 30 days following receipt of a notice from the Company; (2) Consultant has committed fraud, misappropriation, or embezzlement in connection with the Company' s business; (3) Consultant has been convicted of a felony; or (4) Consultant's use of narcotics, liquor, or illicit drugs has a detrimental effect on the performance of his or her employment responsibilities, as determined by the Company.

4.3 Responsibility upon Termination. Any equipment provided by the Company to the Consultant in connection with or furtherance of Consultant's services under this Agreement, including, but not limited to, computers, laptops, and personal management tools, shall, immediately upon the termination of this Agreement, be returned to the Company.

ARTICLE 5 CONFIDENTIAL INFORMATION

5.1 Obligation of Confidentiality. In performing consulting services under this Agreement, Consultant may be exposed to and will be required to use certain "Confidential Information" (as hereinafter defined) of the Company. Consultant agrees that Consultant will not and Consultant's employees, agents, or representatives will not use, directly or indirectly, such Confidential Information for the benefit of any person, entity, or organization other than the Company, or disclose such Confidential Information without the written authorization of the President of the Company, either during or after the term of this Agreement, for as long as such information retains the characteristics of Confidential Information.

5.2 Definition. "Confidential Information" means information not generally known and proprietary to the Company or to a third party for whom the Company is performing work, including, without limitation, information concerning any patents or trade secrets, confidential or secret designs,

processes, formulae, source codes, plans, devices or material, research and development, proprietary software, analysis, techniques, materials, or designs (whether or not patented or patentable), directly or indirectly useful in any aspect of the business of the Company, any vendor names, customer and supplier lists, databases, management systems and sales and marketing plans of the Company, any confidential secret development or research work of the Company, or any other confidential information or proprietary aspects of the business of the Company.

ARTICLE 6 RIGHTS AND DATA

All drawings, models, designs, formulas, methods, documents, and tangible items prepared for and submitted to the Company by Consultant in connection with the services rendered under this Agreement shall belong exclusively to the Company and shall be deemed to be works made for hire (the "Deliverable Items"). To the extent that any of the Deliverable Items may not, by operation of law, be works made for hire, Consultant hereby assigns to the Company the ownership of copyright or mask work in the Deliverable Items, and the Company shall have the right to obtain and hold in its own name any trademark, copyright, or mask work registration, and any other registrations and similar protection which may be available in the Deliverable Items.

ARTICLE 7 CONFLICT OF INTEREST AND NON-SOLICITATION

7.1 Non-Solicitation. Consultant covenants and agrees that during the term of this Agreement, Consultant will not, directly or indirectly, through an existing corporation, unincorporated business, affiliated party, successor employer, or otherwise, solicit, hire for employment or work with, on a part-time, consulting, advising, or any other basis, other than on behalf of the Company any employee or independent contractor employed by the Company while Consultant is performing services for the Company.

ARTICLE 8 RIGHT TO INJUNCTIVE RELIEF

Consultant acknowledges that the terms of this Agreement are reasonably necessary to protect the legitimate interests of the Company, are reasonable in scope and duration, and are not unduly restrictive. Consultant further acknowledges that a breach of any of the terms of this Agreement will render irreparable harm to the Company, and that a remedy at law for breach of the Agreement is inadequate, and that the Company shall therefore be entitled to seek any and all equitable relief, including, but not limited to, injunctive relief, and to any other remedy that may be available under any applicable law or agreement between the parties. Consultant acknowledges that an award of damages to the Company does not preclude a court from ordering injunctive relief. Both damages and injunctive relief shall be proper modes of relief and are not to be considered as alternative remedies.

ARTICLE 9 GENERAL PROVISIONS

9.1 Construction of Terms. If any provision of this Agreement is held unenforceable by a court of competent jurisdiction, that provision shall be severed and shall not affect the validity or enforceability of the remaining provisions.

9.2 Governing Law. This Agreement shall be governed by and construed in accordance with the internal laws (and not the laws of conflicts) of the State of Florida.

9.3 Complete Agreement. This Agreement constitutes the complete agreement and sets forth the entire understanding and agreement of the parties as to the subject matter of this Agreement and supersedes all prior discussions and understandings in respect to the subject of this Agreement, whether written or oral.

9.4 Dispute Resolution. If there is any dispute or controversy between the parties arising out of or relating to this Agreement, the parties agree that such dispute or controversy will be arbitrated in accordance with proceedings under American Arbitration Association rules, and such arbitration will be the exclusive dispute resolution method under this Agreement. The decision and award determined by such arbitration will be final and binding upon both parties. All costs and expenses, including reasonable attorney's fees and expert's fees, of all parties incurred in any dispute that is determined and/or settled by arbitration pursuant to this Agreement will be borne by the party determined to be liable in respect of such dispute; provided, however, that if complete liability is not assessed against only one party, the parties will share the total costs in proportion to their respective amounts of liability so determined. Except where clearly prevented by the area in dispute, both parties agree to continue performing their respective obligations under this Agreement until the dispute is resolved.

9.5 Modification. No modification, termination, or attempted waiver of this Agreement, or any provision thereof, shall be valid unless in writing signed by the party against whom the same is sought to be enforced.

9.6 Waiver of Breach. The waiver by a party of a breach of any provision of this Agreement by the other party shall not operate or be construed as a waiver of any other or subsequent breach by the party in breach.

9.7 Successors and Assigns. This Agreement may not be assigned by either party without the prior written consent of the other party; provided, however, that the Agreement shall be assignable by the Company without Consultant's consent in the event the Company is acquired by or merged into another corporation or business entity. The benefits and obligations of this Agreement shall be binding upon and inure to the parties hereto, their successors and assigns.

9.8 No Conflict. Consultant warrants that Consultant has not previously assumed any obligations inconsistent with those undertaken by Consultant under this Agreement.

IN WITNESS WHEREOF, this Agreement is executed as of the date set forth above.

[COMPANY] [CONSULTANT]

By: _____ From Seed LLC By: _____ Chestnut Hill Tax Farm

Its: 6-30-15 Its: Partner

6/15/15

Donn M. Dennis, MD

Donn Dennis is the JS Gravenstein MD Endowed Professor of Anesthesiology at the University of Florida's Department of Anesthesiology. He currently teaches medical courses in anesthesiology, pharmacology, and experimental therapeutics. He is the Director of Nanomedicine and Co-Director at the Center for Nano-Bio Sensors. Dr. Dennis will serve as a medical doctor advocate for all the executive members of the company, with particular emphasis on cannabis research and development for patient use. An expert in the medical research field, Dr. Dennis received his education from three prominent establishments, completing his residency in anesthesiology and a research fellowship in cardiovascular pharmacology and electrophysiology at the University of Florida College of Medicine, finishing his internship at William Beaumont Hospital in Royal Oak Michigan, and receiving his Doctorate Degree from the University of Michigan in Ann Arbor.

Dr. Dennis's clinical interests include: translational research, nanomedicine, drug research and development. Within his role in the company, he will explore new ways to provide helpful patient and caregiver education, while researching new advances in the medicinal cannabis field. Dr. Dennis is a strong believer that education is a powerful way to initiate progressive changes in the world, including health and health care in our society.

Margaret Gedde, MD, PhD

Dr. Margaret Gedde is a Stanford-trained MD PhD pathologist and award-winning researcher who worked for years developing drugs in the pharmaceutical industry. In 2004, Dr. Gedde left that industry to open an alternative medical practice focused on holistic, supportive, non-pharmaceutical therapies that can offer large benefits to patients but are not accepted by conventional medicine. Currently, Dr. Gedde specializes in the use of cannabis to help patients get healthier and partake in a better quality of life.

Dr. Gedde has significant experiencing working with virtually all clinical services and therapeutic areas in hospital environments through consultations, nightly calls, examinations, and clinical rounds. As Chief Resident, she led morning resident rounds, organized didactic and journal club series, and was liaison to the administration, facilitating two-way communication between faculty and residents. She worked closely with patients, addressing resident complaints and practiced conflict resolution.

Working to benefit her patients, Dr. Gedde studied techniques by practitioners who used alternative methods including targeted nutritional therapy, therapeutic tissue cleansing, vibrational healing, herbal medicine, and bioidentical hormone therapy. Her clinics ultimately came to focus on the medical use of cannabis for her patients, offering individuals less risky therapy than any pharmaceutical in treatment of chronic pain, nausea and other conditions.

Jill Lamoureux

Jill Lamoureux is a nationally recognized cannabis business expert in Colorado with extensive experience in cultivation, manufacturing and distribution. Lamoureux was the only industry representative to serve on both the Colorado Department of Public Health and Environment and the Colorado Department of Revenue medical cannabis advisory committees. She also serves as a subject matter expert to BOTEC Analysis Corporation for Washington State. Lamoureux regularly consults to public and private clients on a wide variety of subject matter from operations and regulations to finance and due diligence.

Lamoureux has personally experienced the positive quality-of-life impact medical cannabis has on individuals and their families and has been an ardent patient advocate. Due to her first-hand experience with developing a newly regulated system in Colorado, Lamoureux understands the importance of addressing patient, industry, and regulator needs in an effective system.

Lamoureux has presented on cannabis operations, financing, and regulation in multiple venues including finance conferences, continuing legal education courses, law review panels, and most recently at RAND's public policy workshop. She earned her MBA from the University of Denver and has worked in small business start-ups and quasi-governmental entities. Lamoureux served as a municipal bond trustee, finance director, and treasurer for eight years before entering the medical cannabis industry. She served as the second Chair of the National Cannabis Industry Association. Lamoureux currently serves as the Chair of the Patient Focus Certification Review Board and as a member of the American Herbal Products Association Cannabis Committee. Lamoureux has presented on medical cannabis business topics and has taught CLE courses on rules and regulations nationally and in Canada.

As a former dispensary and cultivation owner and operator, she brings first-hand experience to her compliance work and procedures writing. Lamoureux has provided regulatory consulting for all three medical cannabis trade associations in Colorado and holds contracts with both legal and consulting groups providing compliance, application management, and writing services.

Jahan P. Marcu, Ph.D.

499 Maple St. #2
Brooklyn, NY 11225
215-828-9183
Rddirector@gsdiagnostics.com

EDUCATION:

Ph.D. Cell Biology, Temple University. "Novel Insights into CB1 Receptor Signaling and the Anabolic Role of Cannabinoid Receptors in Bone."
Bachelor of Science, Molecular Cell Biology, San Francisco State University, 2007.
Minor, Chemistry**,** San Francisco State University, 2007.
Minor, Speech and Communications**,** San Francisco State University, 2007

EXPERIENCE/ SCIENTIFIC TRAINING:

Director of Research and Development, Green Standard Diagnostics, CEO Beth McCauley, May 2013-Current

- **Current Focus:** Medical cannabis and herbal supplement regulation and consulting, auditing of medical cannabis operations for Patient Focused Certification program, method development and validation of quantitative analysis (Contamination, potency, and genetics) of medicinal plants, developing delivery systems for cannabinoids.

Graduate Student, Temple University School of Medicine, Department of Anatomy and Cell Biology, Center for Substance Abuse, Dr. Mary Abood. September 2008- May 2013.

- **Research Focus:** Presently involved in two research projects: 1) mutational analysis of the CB1 receptor and 2) investigating cannabinoid receptor signaling mechanisms in bone cells via CB1 and CB2 receptors.
- **Techniques Used:** PCR for generating plasmids with specific mutations, cell culture methods to create and maintain stable CB1 mutant cell lines, immunocytochemistry, radioligand binding assays, western blot analysis, isolation of stem cells from animals, and assays for determining the metabolic activity of bone.

Lab Manager & Technician, California Pacific Medical Center Research Institute, Dr. Dieter Gruenert May 2007-August 2008

- **Research Focus:** studying the cystic fibrosis transmembrane receptor and maintaining Dr. Dieter Gruenert's research program. This involved processing of material transfer agreements & reimbursement payments for cell lines, providing cell culture protocols & cell culture troubleshooting for laboratories, maintaining cell lines in culture for international shipping, maintaining an extensive cell line inventory, and routine characterization of the cell lines.

- **Techniques used:** Advanced and specialized cell culture techniques for human airway epithelial cells, basic culture techniques for stem and hematopoietic cells, qRT-PCR, and Mycoplasma detection.

Technician, California Pacific Medical Center Research Institute, Dr. Charles Cobbs
April 2008-August 2008

- **Research Focus:** Investigating the role of HCMV in neural stem cell oncogenesis, contributing critical information towards understanding the roles of this virus in glioma biology and a basis for the design of novel therapeutics targeting these tumors.
- **Techniques used:** Receiving and culturing primary brain tissue samples. Cell sorting for stem cell populations from primary brain tumors. DNA, RNA, and protein extraction from human brain tissue. Protein quantification and western blot analysis.

Technician, California Pacific Medical Center Research Institute. Mentor, Dr. Sean McAllister. July 2005-April 2008

- **Research Focus**: Investigating anticancer activity of synthetic and natural cannabinoids in brain cancer cell lines. Determining if synergistic inhibitory effects of cannabinoids, on cancer cells, are present using combinations of plant constituents.
- **Techniques Used**: Basic cell culture, MTT assay for analysis of cell proliferation, cell flow cytometry, Boyden Invasion Chamber Assay, and western blot.

Staff Research Associate II, Department of Diabetes and Endocrine Research**,** University of California San Francisco, Mt. Zion Campus. Principle Investigator Dr. Ira Goldfine. March 2005-August 2008.

- **Research Focus**: Maintaining a mouse colony. Investigating breast cancer pathology from the over expression of the human fetal insulin receptor in transgenic mice.
- **Techniques Used**: Plasmid Transformation, Polymerase Chain Reaction, DNA extraction, Harvesting organs from transgenic mice for whole mounts, paraffin embedding, and protein analysis.

Overseas Research Internship, University of Leiden, Holland. Principle Investigator**:** Dr. Arno Hazekamp. July 2006.

- **Research Focus:** Extraction, isolation, and molecular structure determination of plant compounds.
- **Techniques used:** Centrifugal Partition Chromatography, High-Performance Liquid Chromatography, Gas Chromatography-Mass Spectrometry, Thin Layer Chromatography, and Nuclear Magnetic Resonance

Independent Research Project, San Francisco State University. April 2003-December 2005. Supervisor: Dr. Pete Palmer

- **Research Focus**: Investigating a possible therapeutic applicability for ratios of active constituents on medicinal plants using Gas Chromatography-Mass Spectrometry and surveys.

Overview of Project:

- Conducted internet and library research on plant therapeutics
- Interviewed persons who regularly use plant-based medicine
- Developed experimental designs for compound specific quantification in plant extracts
- Attempted to correlate illness and symptomatic-specific applicability of compound ratios
- Knowledgeable in specific therapeutic values of different plants

PUBLICATIONS:

American Herbal Pharmacopeia, Monograph *Cannabis Inflorescence* Standards of Identity, Analysis, and Quality Control (2013) www.herbal-ahp.org.

Marcu, Jahan*, Christian, Rigel T.,*, Zielinski,Anne Horowitz Maxx P., Lau, Darryl, Moore, Dan H. Desprez, Pierre-Yves, Yount, Garret L., McAllister, Sean D. (2011) Cannabidiol enhances the inhibitory effects of delta9-tetrahydrocannabinol on human glioblastoma cell proliferation and survival. *J Mol Cancer Ther.*

Marcu, Jahan P., Shore, Derek, Kapur, Ankur, Trznadel, Megan, Makriyannis, Alexandros, Reggio, Patricia, and Abood, Mary E. (2013). Novel Insights Into CB1 Cannabinoid Receptor Signaling: A Key Interaction Identified Between EC3-Loop and TMH2. *J Pharmacol Exp Ther.*

Brailoiu, G. Cristina; Deliu, Elena; Marcu, Jahan; Abood, Mary; Brailoiu, Eugen. (2014) Differential Activation of Intracellular vs Plasmalemmal CB2 Cannabinoid Receptors. *British Journal of Pharmacology*

Shore DM, Baillie GL, Hurst DH, Navas F, Seltzman HH, Marcu JP, Abood ME, Ross RA, Reggio PH (2014). Allosteric Modulation of a Cannabinoid G Protein-coupled Receptor: BINDING SITE ELUCIDATION AND RELATIONSHIP TO G PROTEIN SIGNALING. *J Biol Chem*

Console-Bram, Linda*, Marcu, Jahan*, Abood, Mary (2012). Cannabinoid Receptors: nomenclature and Pharmacological Principles. *Prog Neuropsychopharmacol Biol psychiatry.*

Marcu, Jahan (2008-until Present) The Lab Bench (Quarterly popular science column published in West Coast Leaf Newspaper)

Marcu, Jahan (2005) An Interview with S.F.S.U. Professor Dr. Ramirez-Weber; The Discovery of a New Cellular Component in Drosphila. *IntersciMagazine* San Francisco State University's College of Science and Engineering magazine Vol. 8.#1.

*Both Authors contributed equally

PUBLICATIONS IN PROCESS:

Marcu, Jahan, Console-Bram, Linda, and Abood, Mary. Book Chapter: Current Cannabinoid Receptor Nomenclature and Pharmacological Principles in Endocannabinoid Regulation of Monoamines in Psychiatric and Neurological Disorders (Editor Van Bocksteale, E.)

AWARDS/GRANTS RECIEVED:

- Court Qualified Cannabis and Synthetic Cannabinoid Expert, Judge Renee Young, 2011
- 2005 Scholarship for Community Service from San Francisco State University
- 2005 and 2006 American's for Safe Access travel grants to attend research conferences in Europe and California.
- 2008 Temple University School of Medicine, Research Achievement Award
- 2009 Travel and research presentation award from the International Cannabinoid Research Society
- 2010 Travel award from the International Cannabinoid Research Society
- 2011 Travel award from the International Cannabinoid Research Society
- 2012 Travel award from the International Cannabinoid Research Society
- SFY10 *(*Abood, Mary) *The Anabolic Role of Cannabinoid Receptors in Bone.* 7/1/2010 – 6/30/2011. Commonwealth Universal Research Enhancement (CURE) Program. Under this Pennsylvania Department of Health established research program, research grants are awarded for clinical, health services, and biomedical research.
- 2013 American's for Safe Access Researcher of the Year Award

PROFESSIONAL AFFILIATIONS/ACADEMIC SERVICE:

Board of Directors, International Association for Cannabinoids as a Medicine, Member 2004-Present

International Cannabinoid Research Society. Member 2006-Present

President, Graduate Student Association, Temple University. August 2009-August 2011.

- Organized annual research days with guest speakers and poster presentations from graduate and medical students, and regular social events for graduate students. Other responsibilities included being an advisor to graduate school dean, giving presentations and fielding questions from prospective graduate students about Temple's graduate program, policies, and student life in Philadelphia.

Faculty, Master Class on Cannabis**,** University of Wageningen, Netherlands, Dr. Arno Hazekamp.Sept. 12th-17th, 2011

- Successful completion of the International Master's Course on Medical Cannabis involved meeting with the professionals behind the Dutch medicinal cannabis program, visiting a legal cannabis growing facility in Veendam, The Netherlands, visiting pharmacies that dispense medicinal cannabis, and learning to assess the cannabis at different stages of growth including forensic techniques for analyzing cannabis in a quality control laboratory.

- Additional Topics covered in his course include basic chemistry of cannabinoids and terpenes, quality control, clinical studies, and administration forms. By a combination of lectures, excursions, literature review and discussions, the course is a unique stepping stone to a more scientific understanding of cannabis as a medicine.

Senior Scientist, Co-Chair, Multidisciplinary and Scientific Advisory Board. Americans for Safe Access (ASA). Executive Director: Steph Sherer. 2005-present.

- Organizing and lecturing at a series of educational seminars on medical cannabis, cannabinoids, and endocannabinoids, contributing author on medical research materials, fundraising and volunteer work with HIV/AIDS and other terminally ill patients.

TEACHING AND TRAINING:

CME (Continuing Medical Education for Clinicians) Teaching Experience for the American Academy of Cannabinoid Medicine and the answerpage.com:
http://aacmsite.org/Default.aspx?tabid=104
www.theanswerpage.com

Student Mentoring: Megan Trznadel, B.A., Kirk Miller, B.S. (2010-2012)

- Undergraduate Students, Neuroscience Program, Temple University. Provided daily mentoring and supervision to these students, which resulted in submitting a co-authored publication and poster presentations at regional conferences.

Instructor/Co-Founder (2010-2011), Cannabinoid Discussion Group, Temple University

- A 1-credit course that is open to undergraduates, graduate, and medical students. Students and faculty take turns presenting published research articles or discussing recently generated data. Involved with organizing curriculum, recruiting students, inviting host/guest speakers, and giving background/introductory talks.

Morristown High School Science Academy Guest Speaker (2 times).

- Invited by the Program Director Jill Magdison to talk about cannabinoid research in a New Jersey high school. Also discussed the road to a science career, presented research, and answered questions about science careers from high school students

SCIENCE WRITING EXPERIENCE:

- Contributor to online CME material at theanswerpage.com, January 2014-Present,
- Research Associate, Editor at the American Herbal Pharmacopeia and Therapeutic Compendium. Cannabis Sativa Monograph, 2013. www.herbal-ahp.org. November 2011-Present.
- Online Editor, O'Shaughnessy's Journal of Cannabis in Clinical Practice, February 2012-Present,
- Editor/Writer, Sensible Science Blog, April 2010-Present.
- Medical Marijuana Writer/Journalist for Philadelphia Examiner, January 2010-Present.

Thomas McGinty

As the company's healthcare advisor, Thomas McGinty brings over twenty-five years of healthcare communications experience to the team. He will assist Chestnut Hill Tree Farm in creating educational programs for the Novia Derivative Products line. McGinty has three years of experience as an extractions and analysis chemist. Additionally, McGinty has three years of chemical analysis equipment service and sales experience. McGinty is an expert in pharmaceutical sales and industry networking, and will be a crucial asset to the company.

Mark J. Rice, MD

Mark Rice is an accomplished medical doctor who shall bring extensive experience in his field and fundamental guidance to the company's general operations and polices. Previously, Dr. Rice was a Professor of Anesthesiology and held the title of Chief of the Division of Multispecialty Adult Anesthesiology at Vanderbilt University, a prestigious private research university located in Tennessee. Currently he is an Associate Professor at the University of Florida College of Medicine's Liver and Transplant Anesthesiology Department. Dr. Rice's research interests include quality improvement, liver transplantation, noninvasive blood analysis, and reflective practice outcomes in medical education.

Dr. Rice is an inquisitive clinician with a passion for education as a power for change and improvement in the health care field. He completed his internship, residency, and research fellowship at the University of Wisconsin Hospital and Clinics Division. Over the past two decades, Dr. Rice has founded as directs several organizations including: Blue Ridge Medical, Inc., in Nashville, TN, Foviopticsc, Inc., in Lexington, Kentucky, as well as Foviopticsc, Inc., in Santa Clara, California where he also held Chief Medical Officer. Additionally, Dr. Rice served as Chairman in the Department of Anesthesiology at Johnson City Medical Center. In 2010, when the catastrophic earthquake hit Haiti, Dr. Rice responded to the international appeals for humanitarian aid, providing his medical services and care to a country in a time of crisis that desperately needed his efforts. While volunteering, Dr. Rice ran the operating room at Sacre Coere Hospital, Milot, Haiti, and performed anesthesia for earthquake victims. Upon his return to the U.S., he was awarded for the "University of Florida and Shands Haitian Relief Efforts," in Alachua Country, Florida.

Mr. John L. Shermyen

Mr. John L. Shermyen serves as the Executive Chairman and Chief Executive Officer of Ingenios Health Co. He brings more than twenty years of executive leadership experience to Ingenios Health and is recognized as a visionary for his entrepreneurial style and bold approach to business.

Shermyen serves as a Venture Partner at Hickory Ridge Capital LLC. He has been the Chairman and Chief Executive Officer of L&L Acquisition Corp. since July 2010. He founded RadioSoft, Inc., in 1994, and served as its President and Chief Executive Officer from 1994 to July 2009. He is the Founder of Logisticare Solutions, LLC and has been its Chief Strategic Officer since May 20, 2009. Mr. Shermyen served as the Chief Executive Officer and President and of Logisticare, Inc. He served as the Chief Strategy Officer for Providence Service Corporation from May 20, 2009 to December 31, 2009. He founded LogistiCare Solutions, LLC in 1987. He served as President and Chief Executive Officer of Logisticare Solutions LLC, a subsidiary of Providence Service Corp. from December 2007 to May 20, 2009. Additionally, Shermyen founded Charter LCI Corporation in 1994. He served as Chief Executive Officer and President Charter LCI Corporation since its inception and Chairman from 1999 to 2004. Shermyen founded Automated Dispatch Services Inc. and served as its Chief Executive Officer from 1987 to 1993. He introduced the capitated, full-risk broker model to state governments, health insurers and other health-related entities in the early 1990’s.

As an executive with more than twenty years of management experience, Shermyen is recognized as a visionary for his entrepreneurial style and bold approach to business. He served as the Chairman of the Board and Director of LogistiCare Solutions, LLC. In 2003, he was recognized with the Ernst & Young Entrepreneur of the Year Award ® in the Business and Technology Services Category for the Southeast region. Mr. Shermyen received his Bachelor's Degree in Geography and Computer Cartography in 1976 and Master's degree in Geography and Computer Cartography in 1979 from the University of Florida.

Josh Stanley

Josh Stanley is a leading medical cannabis entrepreneur and advocate working to advance the medical cannabis industry in the U.S. and throughout the world. Stanley brings to the company over eight years of experience working in the cannabis industry and additionally was one of the first individuals to open a medical cannabis dispensary in Denver, Colorado.

Stanley has been heavily involved in responsible cannabis reform and began Colorado's political action committee and 501c4, the Medical Marijuana Industry Group, which he co-chaired. In 2010, Stanley assisted in the drafting of House Bill 1284, the first bill of its kind to further define and establish Colorado's medical cannabis state regulatory structure through the Colorado Department of Revenue. The following year he co-authored House Bill 1043 and was responsible for writing the research and development portion of the bill. Additionally, Stanley has developed rules and regulations for the Colorado Department of Revenue's Medical Marijuana Enforcement Division as well as the rules and sat on the rules and regulations board for research and development.

Stanley has been co-credited with creating a non-psychoactive strain of the cannabis plant with low-THC and high-CBD content. This specialized breed of sativa variety of medical cannabis has proven to be highly beneficial for varying degrees of epilepsy in both pediatric and adult patients. Stanley's effort to help children patients restore their lives with high-CBD cannabis extracts made international headlines in 2013 and was prominently featured on Sanjay Gupta's highly acclaimed CNN documentary in March of 2014. In addition, Stanley worked with the National Geographic Channel, who tracked his observational research studies and patient successes with medicinal cannabis in Colorado.

In April 2012, Stanley and his five brothers co-founded the "Realm of Caring," a nonprofit organization, committed to promoting a higher-quality of life for Coloradans affected by debilitating conditions through the use of non-smokable forms of concentrated CBD cannabis oil. In 2014, Josh founded "Strains of Hope," a nonprofit dedicated to assisting principalities across the globe in the implementation of responsible rules and regulations of the cannabis industry and to provide further medical research of the cannabis plant as it pertains to a variety of illnesses and disease states.

Shannon Wilson

Shannon Wilson is the founder and owner of Colorado-based Mahatma Concentrates. The company's core belief is simple, to produce only the best, high quality cannabis extractions. This philosophy has resulted in Mahatma Concentrates being recognized through numerous awards including:

- First place in best concentrates in the 2013 High Times Cannabis Cup;
- Second place in best cannabis concentrates in the 2013 710 Cup;
- First place in the best overall champion at the Daba-Doo Invitational in Amsterdam in 2013 and;
- Second place in best concentrates at the Hemp Connoisseur Championship in 2014.

Wilson is an active member of the NCIA, CBA, and MIG. In addition, she is a founding member of Women Grow and currently serves as chairman for MIG's Concentrates Committee. Wilson offers valuable insight and expertise to the company, scaling a large manufacturing operation within a regulated environment successfully.

PROFESSIONAL LICENSING DISCLOSURES

Not applicable

Part C.3.C.g. A list of current and proposed staffing including: i. Position, duties and responsibilities; Resume; and iii. Professional licensure disciplinary action in all jurisdictions

Employee/Consultant Statement – Professional Licensure Disciplinary Action
Attn: Office of Compassionate Use – Florida Department of Health

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Instructions – please initial the correct statement.

SLB I hereby attest that I have never received a professional licensure disciplinary action in any jurisdiction.

_____ I have received one or more professional licensure disciplinary actions. If initialed, please provide an explanation:

Susan L. Baumgartner
Signature

Susan L. Baumgartner
Printed Name

7/2/15
Date

Employee/Consultant Statement – Professional Licensure Disciplinary Action
Attn: Office of Compassionate Use – Florida Department of Health

Instructions – please initial the correct statement.

BB X I hereby attest that I have never received a professional licensure disciplinary action in any jurisdiction.

_____ I have received one or more professional licensure disciplinary actions. If initialed, please provide an explanation:

Signature

Brady Blake
Printed Name

7/6/15
Date

Employee/Consultant Statement – Professional Licensure Disciplinary Action
Attn: Office of Compassionate Use – Florida Department of Health

Instructions – please initial the correct statement.

DAG I hereby attest that I have never received a professional licensure disciplinary action in any jurisdiction.

_____ I have received one or more professional licensure disciplinary actions. If initialed, please provide an explanation:

Deborah A. Gaw
Signature

Deborah A. Gaw
Printed Name

7/2/15
Date

Employee/Consultant Statement – Professional Licensure Disciplinary Action
Attn: Office of Compassionate Use – Florida Department of Health

Instructions – please initial the correct statement.

_____✔ I hereby attest that I have never received a professional licensure disciplinary action in any jurisdiction.

_____ I have received one or more professional licensure disciplinary actions. If initialed, please provide an explanation:

_____
Signature

Sam Glucksman, DPM, CCA
Printed Name

7-02-15
Date

Employee/Consultant Statement – Professional Licensure Disciplinary Action
Attn: Office of Compassionate Use – Florida Department of Health

Instructions – please initial the correct statement.

KMP I hereby attest that I have never received a professional licensure disciplinary action in any jurisdiction.

_____ I have received one or more professional licensure disciplinary actions. If initialed, please provide an explanation:

Signature

Kristopher Palmer
Printed Name

7-2-15
Date

Employee/Consultant Statement – Professional Licensure Disciplinary Action
Attn: Office of Compassionate Use – Florida Department of Health

Instructions – please initial the correct statement.

✓ I hereby attest that I have never received a professional licensure disciplinary action in any jurisdiction.

_____ I have received one or more professional licensure disciplinary actions. If initialed, please provide an explanation:

Signature

ROBERT D. WALLACE
Printed Name

7/1/15
Date

DISPENSING JOB DESCRIPTIONS

MEDICAL DIRECTOR
Reports to: Chief Operating Officer

Job Description: Supervises the activities of the Dispensing Organization.

Job Responsibilities: Assist with production plans for Derivative Product productions. Oversee the activities of the dispensary including patient interactions. Monitor quality and consistency of products ensuring specifications are maintained. Oversee the Dispensary Manager.

Core Job Duties

Support and Management:

- Responsible for directing the Dispensary Manager. Serves in the manager role when necessary.
- Responds to all employee questions, concerns, or suggestions and takes action when necessary to resolve conflicts.
- Coordinates with the executive management team to ensure accurate information is communicated to the appropriate staff.

Dispensing Organization Management:

- Oversees all processing tasks and processes, ensures proper documentation of all applicable activities in accordance with regulations and standards set by the company.
- Oversees product development by ensuring the proper tasks are executed and sanitation levels are maintain to maintain superior product quality.
- Oversees patient care and education programs.

Reports and Documentation:

- Oversees the maintenance of accurate records of all dispensing activities including employee records, inventory records, production records, materials receipt, returns, etc. in accordance with regulations and standards set by the company.

Qualifications:

- Must be a team player working across functions.
- Ability to communicate frequently and effectively with management and staff.
- Must be licensed and in good standing pursuant to Chapter 458 or Chapter 459 of the Florida Statutes and able to supervise the activities of the proposed Dispensing Organization.
- Experience with epileptic patients; cancer patients; patients with severe seizures or muscle spasms is preferred;
- Knowledge of the use of low-THC cannabis for treatment of cancer or physical medical conditions that chronically produce symptoms of seizures or severe and persistent muscle spasms;
- Knowledge of good manufacturing practices;
- Knowledge of analytical and organic chemistry;
- Knowledge of analytical laboratory methods;
- Knowledge of analytical laboratory quality control, including maintaining a chain of custody;
- Knowledge of, and experience with, CBD/low-THC extraction techniques;

- Knowledge of CBD/low-THC routes of administration;
- Experience in or knowledge of clinical trials or observational studies;
- Knowledge of, and experience with, producing CBD/low-THC products;
- Experience with or knowledge of botanical medicines;
- Experience with dispensing medications; and
- Must pass a Level 2 background check.

Part C.3.C.g. A list of current and proposed staffing including: i. Position, duties and responsibilities; Resume; and iii. Professional licensure disciplinary action in all jurisdictions

DISPENSARY MANAGER
Reports to: Medical Director

Job Description: Supervises the activities of the Dispensing Organization.

Job Responsibilities: Responsible for managing the day-to-day operations of the dispensary facility in accordance with the law and company policy. Provides support for all dispensary employees, including schedules, training, policy and procedure updates, industry news, and product information. Responsible for the ordering and receiving of all inventory and products, arranging deliveries, maintaining facility compliance and cleanliness.

Core Job Duties

Support and Management:

- Responsible for managing dispensary staff, schedules, inventory, and patient relations.
- Serves as a role-model and resource for dispensary staff concerning products and services, policies and procedures, industry news, and changes in regulations.
- Responds to all agent questions, concerns, or suggestions and takes action when necessary to resolve conflicts.
- Responsible for delegating tasks to Patient Associates in order to maintain a compliant and clean dispensary facility.
- Coordinates with the executive management to ensure accurate information is communicated to the dispensary staff.

Dispensary Management:

- Provides superior customer service for vendors and patients.
- Responds to all patient complaints, requests, concerns, or suggestions and takes action when necessary to resolve conflicts.
- Oversees orders and deliveries to ensure accurate order information and timeliness of deliveries.

Reports and Documentation:

- Maintain accurate records of all dispensary activities including patient records, sales, deliveries, and returns in accordance with law, regulation, and company policy.
- Maintain inventory control system and perform daily counts of all marijuana and marijuana products in the facility.
- Provide regular inventory and sales reports to the Medical Director and Controller.

Qualifications:

- Must be a team player working across functions.
- Ability to communicate frequently and effectively with management and staff.
- BS degree in management and five years of experience with healthcare management. Industry experience may be considered in place of a degree.
- Must complete the 8 hour physician training course prior to starting work.
- Effective personnel manager.
- Demonstrated knowledge of regulatory requirements including Florida, OSHA regulations, and FDA guidelines for food plant operations.
- Experience with sales and cash management.

- Ability to develop new products to meet market demands.
- Strong time management, record keeping, analytical and problem solving skills.
- Proficient in the use of computer software such as Microsoft Word and Excel and able to learn other software.
- Must be sufficiently proficient in English to read and interpret documents such as safety and security rules, operating and maintenance instructions, procedure manuals, etc. and write routine reports.
- Must be able to stand and walk on hard surfaces, be able to work in a hot and/or humid environment, be able to lift 25 pounds.
- Must pass a Level 2 background check.

PATIENT ASSOCIATE
Reports to: Dispensary Manager

Job Description: Provides support to the Dispensary Manager and facilitates patient interactions.

Job Responsibilities: Responsible for patient orientation, data, paperwork, and upkeep. Maintain accurate records of patient identification and registration documents, manage patient scheduling, answer phones and respond to patient and legal representative inquiries. Record, arrange, and package patient orders. Maintain an organized environment and facility appearance.

Core Job Duties

Patient Service and Recordkeeping:

- Welcome patients as they enter the facility. Provide exceptional service for new patients and answer any questions they may have and providing brief orientations and tours when needed.
- Obtain the appropriate documentation from each patient and legal representative at every visit, ensuring validity of their identification and registration with the State.
- Record each visit using BioTrackTHC, ensuring accuracy of patient and legal representative information, and recording notes if necessary.
- Communicate with other employees to maintain a steady patient flow to maximize efficiency and customer satisfaction.
- Record and collaborate with staff on preorders and online orders to ensure accurate order information and timeliness of delivery.
- Respond to and resolve patient requests, complaints, or compliments in person, through email, and on the phone requesting supervisor support as needed.
- Maintain organization of desk space and waiting room through daily upkeep and light cleaning.

Medical Cannabis Education and Guidance:

- Maintain knowledge of all applicable state and local laws, as well as company policies and procedures.
- Maintain a basic understanding of the medicine, products, and services provided by the company.
- Educate customers on the processes of registration, renewals, lost registration documents, etc.
- Communicate with customers about their personal goals in using cannabis and provide educational materials and resources for customers as needed.
- Record specific requests, preferences, and notes concerning patient status using BioTrackTHC.
- Maintain awareness of customer input and suggest changes to improve service or product.

Qualifications:

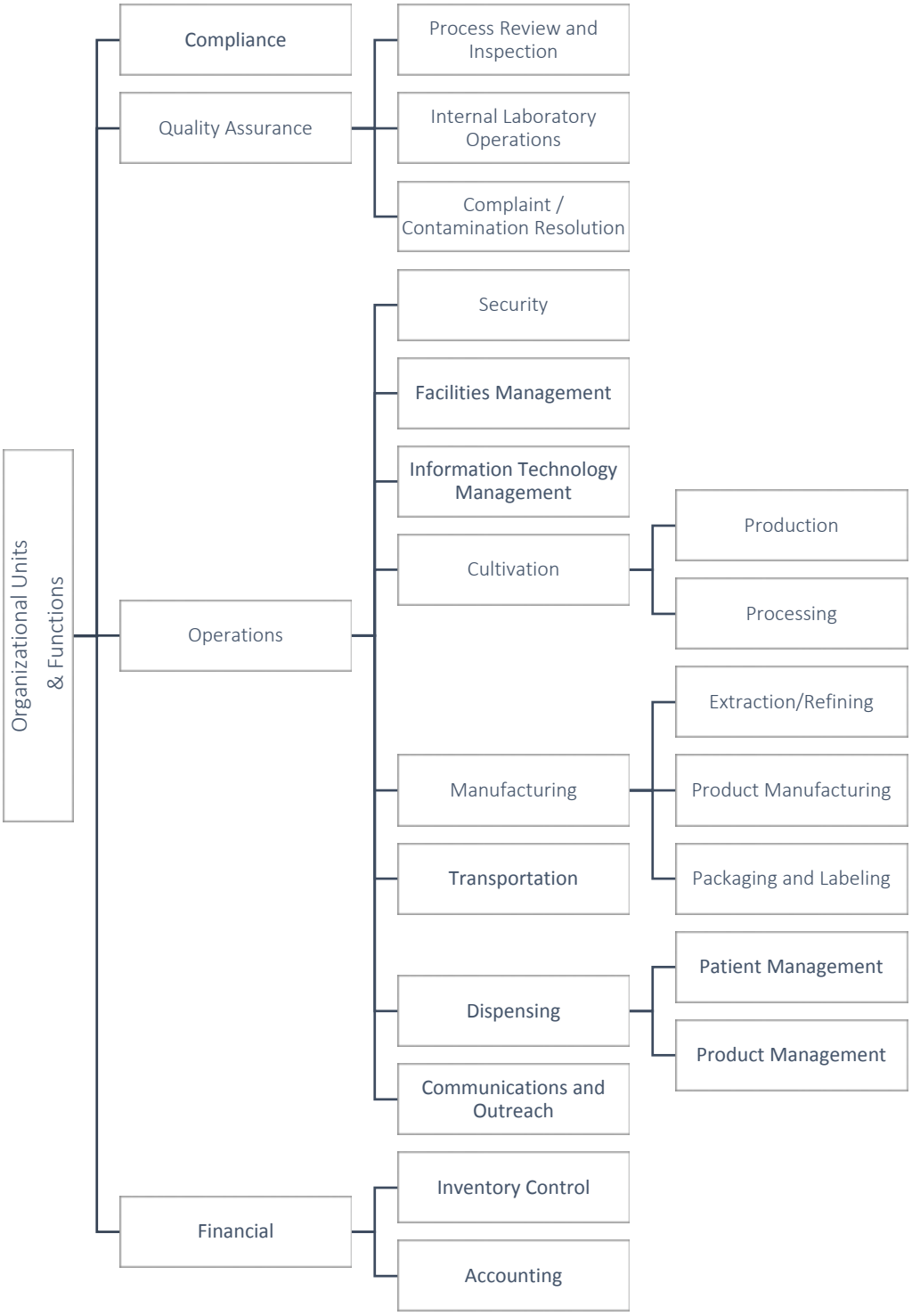
- Must be a team player working across functions.
- Ability to communicate frequently and effectively with management and staff.
- BS degree in management and two years of experience with healthcare management. Industry experience may be considered in place of a degree.
- Effective customer service provider.
- Demonstrated knowledge of regulatory requirements including Florida and OSHA regulations.
- Experience with sales and cash management.
- Strong time management, record keeping, analytical and problem solving skills.
- Proficient in the use of computer software such as Microsoft Word and Excel and able to learn other software.

- Must be sufficiently proficient in English to read and interpret documents such as safety and security rules, operating and maintenance instructions, procedure manuals, etc. and write routine reports.
- Must be able to stand and walk on hard surfaces, be able to work in a hot and/or humid environment, be able to lift 25 pounds.
- Must pass a Level 2 background check.

Part 3.C.3.h. An organizational chart illustrating the supervisory structure of the cultivation function of the proposed Dispensing Organization

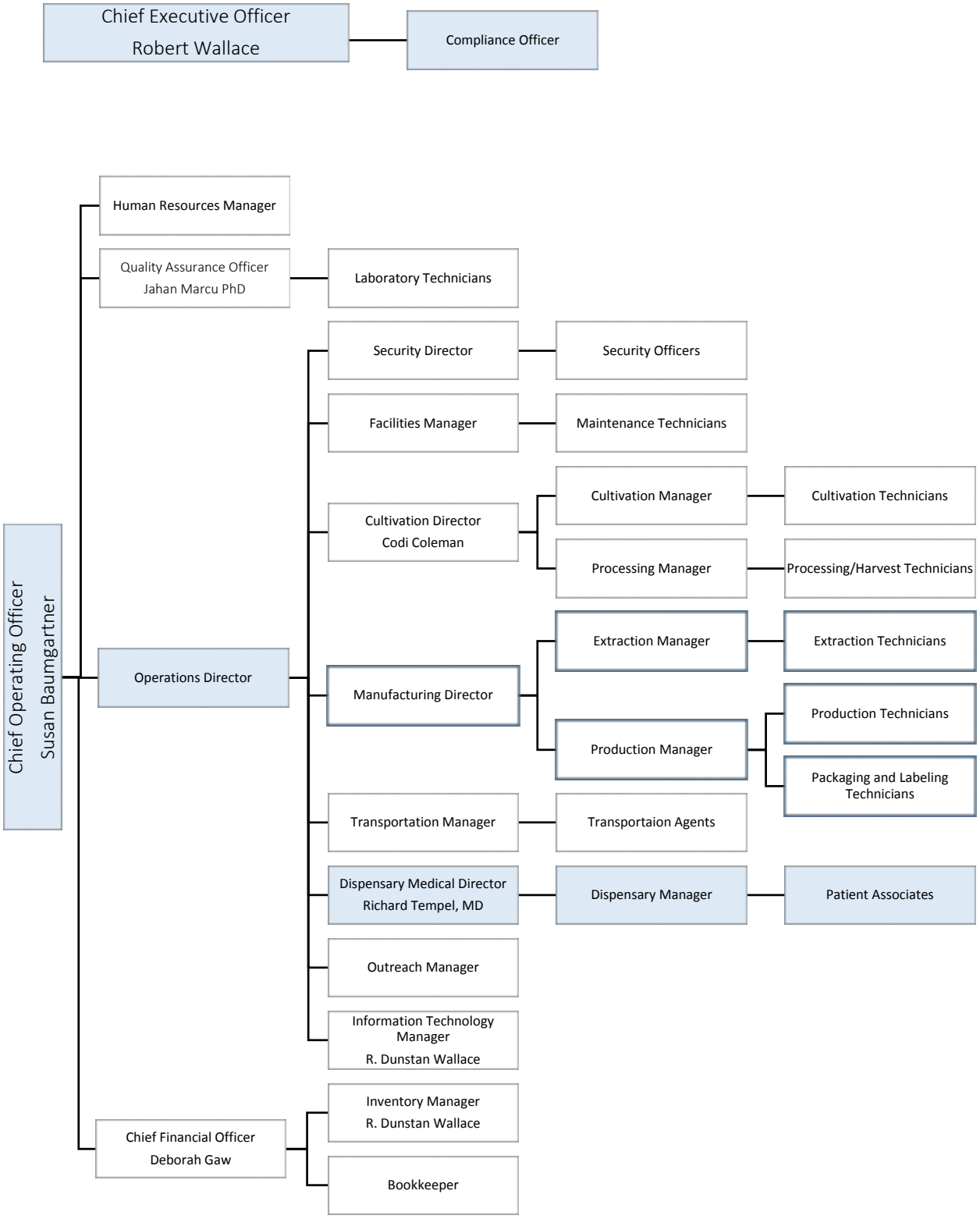
FUNCTIONAL OVERVIEW

The company is structured by operating functions. The chart below illustrates the units of division.



Part 3.C.3.h. An organizational chart illustrating the supervisory structure of the cultivation function of the proposed Dispensing Organization

DISPENSING UNIT



Part 3.C.3.h. An organizational chart illustrating the supervisory structure of the cultivation function of the proposed Dispensing Organization

Part 3.C.3.i. Plans and procedures for loss of key personnel

REDUNDANCY FOR KEY PERSONNEL

The company's staffing plan contemplates cross training for all key personnel. This integrated organizational structure allows the maintenance of the company's high operating standards even when key personnel are absent. Each operating unit will always ensure that a minimum of two staff members are capable of managing the highest functions of the unit.

RETENTION OF EXPERTS

Multiple industry experts have already been retained by the company as advisors for the planning and application process. These experts will remain engaged with the company during start-up operations. They provide professional back-up options for all cultivation functions in the organization. These advisors have allocated time to assisting the company and will be available in any emergency scenario to provide operational functionality until normal operations are restored. As these experts designed the company's operating model, they are the best solution during stressed operating periods.

CONTINGENCY PLANNING

The loss of one key employee can cripple the operation. The Chief Executive Officer and Chief Operating Officer will develop contingency plans for human resource risks such as death, disability, family leave, or turnover. The plan will help to reduce the company's risk of operational failure.

PLAN ELEMENTS

The company's human resource contingency plan addresses several components. The plan seeks to make it easier to replace departing personnel and to reduce the chance of their leaving. The Chief Operating Officer will provide an annual risk-assessment that:

- Determines potential human resource risks;
- Ranks the probability any given risk will occur; and
- Estimates the severity of the impact on the company.

The annual business impact analysis evaluates how losing a given employee will affect operations and the company's finances. The plan will identify risk mitigation strategies for the identified risks.

RISK MANAGEMENT

Chestnut Hill Tree Farm will manage human resource risks by: retaining, reducing, avoiding, or transferring the risks. Human resource policies reduce the probability of key personnel from electing to resign. Strict protocols addressing employee benefits and personnel policies provide key employees with an understanding of their roles and responsibilities reducing job dissatisfaction.

TRANSFERRING RISK

Key person insurance transfers some key personnel risk. The policy protects against the death or disability of key employees. The company will use the proceeds from these policies to keep the company running until a replacement is identified and trained. The company will carry key employee insurance for the head of each operating unit. The policy will allow the company to immediately bring in consultants and industry experts to help manage and recruit and train a replacement so that no operational interruptions occur.

STAFF ACQUISITION PROCESS

The Human Resources Manager will coordinate with the Chief Operating Officer to acquire all necessary staff including key personnel. The acquisition process may vary depending on the vacant position and any special circumstances including Chief Executive Officer approval for a direct non-solicited hire. The acquisition process is managed by the Human Resources Manager and typically involves the following:

- Identification of need.
- Job classification and job description preparation.
- Solicitation of the vacant position utilizing the methods that best fit the position including, but not limited to:
  1. Internal posting,
  2. Partner posting (consultants, non-profit partners, vendors, etc.),
  3. External posting,
  4. Temporary staffing agency; or
  5. Executive search firm.
- Reviewing resumes and required job applications for qualified candidates including those with relevant experience and those with complementary skills and a strong potential for growth.
- Performing and recording reference checks on qualified candidates including verification of address, education, and former and current employment.
- Recording of information from former supervisors on the candidate's performance if available.
- Scheduling first interviews.
- Scheduling second interviews (with strong candidates) with the direct supervisor.
- Delivery of an offer letter to the first choice candidate (as determined by the direct supervisor).
- Performing a Level 2 criminal background check on the selected candidate to determine eligibility and to identify any other possible disqualifying items.
- New hire orientation and training.
- Completion of the probationary period.

CONSULTANT ACQUISITION

Consultants may be utilized when approved by the Chief Executive Officer. All consulting contracts must be in writing, will contain suitability provisions, and require compliance with all applicable laws and regulations. Consultants will receive and acknowledge relevant sections of the company's Employee Handbook and selected Standard Operating Procedures as appropriate for their scope of responsibilities and will bear the same responsibilities as employees of the company as outlined in their consulting services agreements. Consultants may be used where third-party services are desired for separation of duties (i.e. IT, accounting, and audit and compliance).

DISQUALIFYING ITEMS AND ITEMS OF CONSIDERATION

Chestnut Hill Tree Farm will not hire any person that is not eligible. All staff will be 21 years of age or older. The Human Resources Manager will not employ anyone who will come in contact with or handle medical cannabis who has been convicted of any theft, violent crime, or felony of sale or possession of drugs, narcotics, or controlled substances. Other items discovered through the reference check process may be considered when making a hiring decision including, but not limited to:

- A history of theft, acts of violence, or negligence;
- Unverifiable resume or application statements;
- Negative reference checks or inability to obtain a positive reference from any former employers;
- Lack of stability in work history or residence;

- Employment with any independent laboratory providing services for the operation or physician's office providing medical cannabis patient certifications.

DISCRIMINATORY PRACTICES

Chestnut Hill Tree Farm does not discriminate in hiring or operating decisions. All managers and supervisors will comply with all EEOC guidelines when managing staffing issues. No policy or procedure implemented by the company may lead to discrimination based on or conflict with laws regarding:

- Race or Ethnicity
- Height or Weight
- Credit Rating or Economic Status
- Religious or Political Affiliation or Beliefs
- Citizenship
- Marital Status, Status as Parent or Number of Children
- Sexual Orientation
- Gender
- Arrest or Conviction unless in a sensitive position
- Security/Background Checks For Certain Religious or Ethnic Groups
- Disability or handicap
- Medical Questions & Examinations

Part 3.C.3.j. Plans and procedures for complying with OSHA regulations for workplace safety

WORKER SAFETY AND PROTECTION

The company's safety policies and procedures ensure the implementation of best safety practices at all times and in accordance with Occupational Safety and Health Administration ("OSHA") guidelines throughout all facilities and operations. The systematic guidelines established will be strictly enforced, as the safety of employees and the public is the company's foremost business consideration. All employees will comply with all applicable safety regulations as listed in the Standard Operating Procedures ("SOPs") as a condition of employment. Safety training will be provided as often as necessary and annually at a minimum.

Employer and employee responsibilities are addressed in the SOPs and a designated Safety Coordinator is named as the primary contact for safety-related matters. Regular required safety inspections are required along with respirator use and training procedures.

All facilities will be inspected quarterly by the Facilities Manager to identify potential hazards using the OSHA Self-Inspection Checklist to prevent hazardous material and chemical incidents that could result in injury and/or illness to any employee or visitor. It is established that requirements of OSHA's Hazard Communication standard will be met and unit managers are assigned responsibility for conducting job specific hazard training on chemicals used by their employees. After attending training, each employee will sign a form to verify that he or she attended the training and understands the company's policies on hazard communication.

Copies of Material Safety Data Sheets ("MSDS") for all hazardous chemicals to which employees may be exposed will be available on the intranet and by hard copy in each chemical storage area of the operating unit in a designated MSDS binder. Sample documents include accident report forms, a safety rule violation notice, and the OSHA Self-Inspection Checklist.

Safety rules addressed include those relevant to accident and hazard reporting, drug and alcohol use, driving, work-related injuries and the required use of Personal Protective Equipment ("PPE"). Enforcement measures and disciplinary actions detailed are to be implemented in response to safety rule violations established herein. All emergency situations including chemical spill response will be handled by local emergency response agencies in accordance with the company's emergency and incident response SOPs. Additional measures serve to establish procedures for injury claims and policies related to workers' compensation and benefits provided.

RESOURCES

Occupational Safety and Health Administration

OSHA Applicable Standards: Pharmacy

The following OSHA standards may apply in dispensary facilities:.

Potential Hazards:	Possible Applicable OSHA Standards:
▪ Exposure to hazardous chemicals or drugs.	▪ Hazard Communication Standard: 29 CFR 1910.1200 ▪ Material Safety Data Sheets (MSDS) ▪ Respiratory Protection Standard: 29 CFR 1910.134
▪ Exposure to Bloodborne Pathogens such as HIV, Hepatitis B, and C.	▪ Bloodborne Pathogens Standard: 29 CFR 1910.1030
▪ Exposure of eyes or body of any person to injurious corrosive materials.	▪ Medical Services and First Aid: 29 CFR 1910.151(c)
▪ Denied right of employee or designated representatives to access relevant exposure and medical records.	▪ Employee Exposure and Medical Records Standard: 29 CFR 1910.1020
▪ Exposure to wet surfaces and potential slips and falls.	▪ General Requirements - Walking/Working Surfaces: 29 CFR 1910.22
▪ Exposure to latex allergy.	▪ Provide alternatives to those employees who are allergic to the gloves normally provided. Bloodborne Pathogens Standard: 29 CFR 1910.1030(d)(3)(iii).
▪ Lack of Personal Protective Equipment.	▪ Personal Protective Equipment: 29 CFR 1910.132(a) ▪ Hand Protection: 29 CFR 1910.138(a) ▪ Eye and Face Protection: 29 CFR 1910.133

CULTURE OF SAFETY

It is the policy of the company that the safety of its employees and the public is the company's foremost business consideration. The prevention of accidents and injuries takes precedence over expedience. In the conduct of the company's business, every attempt will be made to prevent accidents from occurring. The company requires that its employees, as a condition of employment, comply with all applicable safety policies and procedures.

The designated Safety Coordinator is the primary contact for safety-related matters. All employees will receive an orientation to the safety policy, safety-related procedures, and rules upon initial employment, and are required to bring to the attention of their unit manager or the Safety Coordinator any unsafe or non-compliant conditions or practices. Managers will communicate these concerns to the Safety Coordinator, who will respond to reports within 24 hours. Safety training will be provided as often as necessary and annually at a minimum with workplace safety discussions included in employee meetings and communications at a frequency determined by management and as needed.

Senior management will be actively involved with employees in establishing and maintaining an effective safety program. The Chief Operating Officer, Safety Coordinator and other members of the management team will participate with all cultivation, processing, and dispensary employees in an ongoing safety program.

The Safety Coordinator must map a safe escape route out of the facility in the event of any emergency. All employees must be trained how to execute all safe escape routes in the event of any emergency. For safety purposes, there shall be no visitors permitted into the extraction lab. Visits from state and authorized government officials are permitted pursuant to current state laws and regulations.

COMPANY RESPONSIBILITIES
The Chief Operating Officer in coordination with unit managers will:

- Provide a safe workplace.
- Facilitate monthly safety meetings.
- Provide safety and health education and training.
- Annually review and update workplace safety rules.

EMPLOYEE RESPONSIBILITIES
All employees will:

- Report all unsafe conditions.
- Immediately report all work-related injuries.
- Wear the required personal protective equipment.
- Abide by the organization's safety rules at all times.

SAFETY COORDINATOR RESPONSIBLITIES
It is the policy of the company to assign a Safety Coordinator to oversee all safety related matters and chair the company's safety committee. The Chief Operating Officer will designate a Safety Coordinator for the company who will be the primary contact for safety-related matters.

Employee Reporting

All employees will receive an orientation to this company's safety rules upon initial employment and will bring to the attention of to their unit manager any unsafe conditions or practices. Unit managers will communicate these concerns to the Safety Coordinator, who will respond to these concerns within twenty-four hours.

Responsibilities of the Safety Coordinator

The Safety Coordinator is responsible for overseeing implementation of the organization's safety program. The Safety Coordinator will:

- Maintain compliance with state mandated rules including current poster provisions and forms available to employees.
- Annually review organization safety policy and rules.
- Maintain accurate records and annually report the results of workplace accident and injury trend analysis.
- Recommend actions to reduce the frequency and severity of accidents and illnesses.
- Integrate safety into the day-to-day activities of all employees.
- Coordinate the new employee orientation and safety training programs.
- Assist the organization in compliance with government standards concerning safety and health.
- Assist unit managers with accident investigation.
- Conduct and record periodic safety inspections to identify unsafe conditions and practices and to determine remedies.
- Ensure all employees are properly trained on hazardous conditions in their unit and that all termination points for gas, electric and water service are clearly marked and known to employees.
- Make recommendations to the Chief Operating Officer on matters pertaining to safety.

Inspections Required

The Safety Coordinator or his or her designee will inspect all the company facilities quarterly to identify potential hazards using the OSHA Self-Inspection Checklist attached. A responsible party will be assigned to correct all hazards as soon as possible. If the hazard is extreme, the inspector in his or her discretion may contact the unit manager to terminate operations until corrected. Per OSHA recommendations, inspections will cover:

- Processing, Receiving, Shipping and Storage - equipment, job planning, layout, heights, floor loads, projection of materials, material handling and storage methods, training for material handling equipment.
- Building and Grounds Conditions - floors, walls, ceilings, exits, stairs, walkways, ramps, platforms, driveways, aisles. Housekeeping Program - waste disposal, tools, objects, materials, leakage and spillage, cleaning methods, schedules, work areas, remote areas, storage areas.
- Electricity - equipment, switches, breakers, fuses, switch-boxes, junctions, special fixtures, circuits, insulation, extensions, tools, motors, grounding, national electric code compliance. Lighting - type, intensity, controls, conditions, diffusion, location, glare and shadow control.
- Heating and Ventilation - type, effectiveness, temperature, humidity, controls, natural and artificial ventilation and exhausting.
- Machinery - points of operation, flywheels, gears, shafts, pulleys, key ways, belts, couplings, sprockets, chains, frames, controls, lighting for tools and equipment, brakes, exhausting, feeding, oiling, adjusting, maintenance, lockout/tag out, grounding, work space, location, purchasing standards.
- Personnel - training, including hazard identification training; experience; methods of checking machines before use; type of clothing; PPE; use of guards; tool storage; work practices; methods for cleaning, oiling, or adjusting machinery.
- Hand and Power Tools - purchasing standards, inspection, storage, repair, types, maintenance, grounding, use and handling.
- Chemicals - storage, handling, transportation, spills, disposals, amounts used, labeling, toxicity or other harmful effects, warning signs, supervision, training, protective clothing and equipment, hazard communication requirements.
- Fire Prevention - extinguishers, alarms, sprinklers, smoking rules, exits, personnel assigned, separation of flammable materials and dangerous operations, explosion-proof fixtures in hazardous locations, waste disposal and training of personnel.
- Maintenance - provide regular and preventive maintenance on all equipment used at the worksite, recording all work performed on the machinery and by training personnel on the proper care and servicing of the equipment.
- PPE - type, size, maintenance, repair, age, storage, assignment of responsibility, purchasing methods, standards observed, training in care and use, rules of use, method of assignment.
- Transportation - motor vehicle safety, seat belts, vehicle maintenance, safe driver programs.
- First Aid Program/Supplies - medical care facilities locations, posted emergency phone numbers, accessible first aid kits.
- Evacuation Plan - establish and practice procedures for an emergency evacuation, e.g., fire, chemical/biological incidents, bomb threat; include escape procedures and routes, critical plant operations, employee accounting following an evacuation, rescue and medical duties and ways to report emergencies.

SAFETY RULES

These safety rules are designed to provide employees with knowledge of the recognized and established safe practices and procedures that apply to many of the work situations encountered while employed at this organization. It would be impossible to cover every work situation. If any employee is in doubt about the safety of any condition,

practice or procedure, they will consult their immediate supervisor for guidance. Any employee that willingly disregards a safety rule may be terminated.

Accident Reporting

All accidents or near misses be reported to a manager or the Safety Coordinator immediately. Falsification of company records, including employment applications, time records or safety documentation will not be tolerated.

Hazard reporting

Employees will notify a unit manager or the Safety Coordinator immediately of any unsafe condition and/or practice.

Alcohol or Illegal drugs

No illegal drugs or alcohol will be allowed on the worksite. Employees will notify their unit manager if they are taking any prescription drugs that might affect their work performance. The use of prescribed medication will be accommodated by the company to every extent possible.

Driving

While driving a company vehicle or driving a personal vehicle for company business, employees will obey traffic laws and signs at all times. Seat belt use is required and employees will obey posted speed limits. Use of cell phone/tablet?

Lifting

When employees are required to lift an item, they should always seek mechanical means (fork lift, lift table, pallet jack, etc.) first. If an item will be lifted manually, employees will refer to the detailed lifting safety rules before performing the task.

Falls

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

Personal Protective Equipment

Appropriate Personal Protective Equipment ("PPE") will be worn at all times during hazardous operations. If an employee has any questions or needs PPE, they will notify their unit manager and reference the PPE job hazard analysis. Employees are required to wear approved eye and face protection when sawing, grinding, drilling, using air tools or performing any other task that could generate flying debris. When working with chemicals, employees will wear the required protective eyewear. Gloves will be worn when handling metal, rough wood, fiberglass and other sharp objects. Hard hats will be provided when there are overhead hazards. Appropriate footwear, long sleeved shirts, long pants, high-visibility vest, etc., should also be worn as required.

EMPLOYEE RESPONSIBILITIES

Each employee is responsible to perform tasks safely and read all safety documentation related to their assigned tasks. If an employee is not properly trained in a function, they will notify their immediate supervisor. Not all work procedures can be addressed. The following items are examples of work conditions some operating units, but are not all-inclusive.

- Do not stand on furniture to reach high places; always use a ladder or step stool.
- Use handrails when ascending or descending stairs or ramps.
- Close all drawers to cabinets after use to prevent tripping or bumping hazards.
- Keep cords neatly banded to prevent tripping hazards.
- Use extra caution when transporting glass to avoid breakage and cuts.
- Keep floors clear of water by mopping during and after watering to avoid slips and falls.
- Wear respirators when mixing and spraying chemicals.
- Wear PPE when performing hazardous operations.
- Ensure all exhaust equipment and emergency shut offs are operational prior to beginning work.

ENFORCEMENT OF SAFETY PLAN

Objective

Safety rules are provided as guidelines for safe operations. All employees will follow these rules as a condition of employment.

Scope

The Safety Plan applies to all employees and contractors.

Procedures

All employees will be given a copy of the safety rules upon initial employment. All employees will sign and return the acknowledgment form after they have been given a chance to review the safety rules and ask any questions. The Safety Coordinator will periodically review the safety rules to ensure they are applicable and current.

Enforcement

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

- Management reserves the right to impose any of the following disciplinary actions it deems appropriate:
    1. Verbal warning with documentation in personnel file.
    2. Written warning outlining nature of offense and necessary corrective action with documentation in personnel file.
    3. Termination.
- Management, including unit managers, shall be subject to the above disciplinary action for the following reasons:
        1. Repeated safety rule violations by employees under their supervision.
        2. Failure to provide adequate training prior to job assignment.
        3. Failure to report accidents and provide medical attention to employees injured at work.
        4. Failure to control unsafe conditions or work practices.
        5. Failure to maintain good housekeeping standards and cleanliness in their departments.

INJURY CLAIMS PROCEDURES

All employees will be provided with an explanation of the workers' compensation system and the benefits it will provide by their unit manager.

- In the event of a work-related injury or illness, the injured employee will report it to his/her unit manager or the Safety Coordinator before the end of the work shift.
- If the injured employee needs immediate medical attention, he/she will be driven or sent to the nearest appropriate hospital or clinic.
- If the injury is not an emergency, an appointment will be made with one of the worker's compensation provider's designated medical providers as soon as possible.
- Once a unit manager has been notified of an injury, the manager will provide a list of designated providers and written instructions. The employee will sign and date this written instruction. A copy will be maintained in personnel files and provided to the employee.
- An accident investigation will be conducted by the responsible unit manager following all work-related injuries. The unit manager or Safety Coordinator will be responsible for interviewing the injured employee and all witnesses.
- The Safety Coordinator will report the claim to the worker's compensation provider.
- If the incident involved an employee death or a catastrophe (three or more employees admitted to the hospital) the Chief Executive Officer will be notified immediately and OSHA (1.800.321.6742) will be notified within eight hours.
- The Safety Coordinator will use information from the accident investigation to identify changes that may help prevent future incidents.
- For lost time claims, the unit manager will contact the injured employee at least once a week to answer questions, keep the injured employee informed of organization activities, and discuss return to work options.
- The Safety Coordinator will contact the medical provider after each appointment to keep current on the employees work status, medical progress, and to ensure that appointments are being kept.
- Modified duty procedures will be as follows:
    1. The employee's unit manager who will determine if the employee can return to their regular job duties will evaluate the medical restrictions.
    2. If the employee is unable to return to normal job duties, the unit manager will determine if the employee's position can be temporarily modified to accommodate the restrictions.
    3. If the job cannot be modified, the Safety Coordinator will evaluate other tasks or positions the employee may be able to perform until the medical restrictions are lifted.
    4. If the employee is unable to return safely to a modified position, the medical restrictions will be re-evaluated after each doctor's visit to ensure the employee is returned to work as soon as possible.
- An entry will be made by the Safety Coordinator on an OSHA 300 Log for all cases involving medical treatment. (Employers with more than 10 employees.)
- Accurate records will be kept for all workers' compensation claims. This file will document all communications regarding the claim and all records from the medical providers and worker's compensation provider.

HAZARD COMMUNICATION POLICY

Policy

Chestnut Hill Tree Farm is committed to the prevention of hazardous material and chemical incidents that could result in injury and/or illness to any employee. The company will spare no effort in providing a safe and healthful work environment for employees and all levels of supervision will be accountable for the safety of those employees under their direction.

The Occupational Safety and Health Administration's ("OSHA") Hazard Communication standard (29 CFR 1910.1200) is based on the simple concept that employees have both a need and a "right to know" the identities and hazards of any chemicals they work with during the course of their employment. Employees also need to know what protective measures are available to prevent chemical exposures and how to avoid adverse health effects.

The following constitutes the company's written Hazard Communication program. The company will meet the requirements of OSHA's Hazard Communication standard as follows:

Container Labeling

It is the policy of the company that no container will be released for use unless it has a complete label. Unit managers will ensure that secondary containers, such as spray bottles, have complete labels. Either (1) a copy of the original manufacturer's label will be made and placed on the secondary container, or (2) the minimal information bulleted above will be placed on the container in permanent ink. The Safety Coordinator will verify that all product containers kept onsite will clearly list contents on the label:

- Product Name;
- Hazard warnings (corrosive, flammable, skin irritant, etc.); and
- Manufacturer's name and address.

Material Safety Data Sheets

Copies of Material Safety Data Sheets ("MSDSs") for all hazardous chemicals to which employees of this company may be exposed will be available on the intranet and by hard copy in each chemical area of the department in a binder designated "MSDS Sheets." Employees are required to read MSDSs for the chemicals they use. MSDSs will be available to all employees during all shifts. If an MSDS is missing, or if a new product arrives without an MSDS, employees will immediately inform the unit manager so they can call the supplier or manufacturer.

Employee Information and Training

Unit managers are responsible for conducting job specific hazard training on chemicals used by their employees. After attending training, each employee will sign a form to verify that he or she attended the training, received written materials, and understands the company policies on hazard communication. Prior to starting work, each new employee will attend a health and safety orientation and will receive information and training on the following:

- An overview of the requirements contained in OSHA's HAZCOM standard: 29 CFR 1910.1200.
- Chemicals present at the company.
- Location and availability of the company's written hazard program.
- Physical hazards and health effects of the company's hazardous chemicals.
- Methods and observation techniques used to determine the presence or release of hazardous chemicals in the work area.
- How to reduce or prevent exposure to these hazardous chemicals by using engineering controls, work practices and personal protective equipment.
- Steps the company has taken to reduce or prevent exposure to these chemicals.
- Emergency procedures to follow if an employee is exposed to chemicals.
- How to read labels and review MSDS to obtain appropriate hazard information.

Training Updates

Training shall be provided at the time of initial assignment to tasks where occupational exposure to a hazardous chemical may take place. Training shall be repeated by the Safety Coordinator whenever a new chemical or a new hazard is introduced in the work area.

Hazardous Chemicals List

Unit managers will maintain a list of all the chemicals and products used at the company within their unit. This list is kept in the front of the MSDS book. Each chemical entry on the inventory list has a corresponding MSDS available for providing specific hazard information and personal protective measures. This list will be updated quarterly by the Safety Coordinator to remove chemicals that are no longer in use at the company and to add new products.

Hazardous Non-routine Tasks

Occasionally, an employee may be asked to perform a task that is not part of their normal job. Before taking on a new task, the affected employee will be given information by their unit manager about any hazardous chemicals that might be used during the activity. This information will include:

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

Contractors

It is the unit manager's responsibility to identify and obtain MSDSs for chemicals any contractor brings into the company facilities. This documentation must be captured in the BioTrackTHC and accessible to management. It is the responsibility of unit managers to provide contractors with the following information:

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

4. ACCOUNTIBILITY

Part 3.C.4.a. Floor plan of each dispensing facility or proposed floor plans for proposed processing facilities including the following: i. Locking options for each means of ingress and egress; ii. Alarm systems; iii. Video surveillance; iv. Name and function of each room; and v. Layout and dimensions of each room

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The company's security plans are attached for review. Chestnut Hill Tree Farm will engage the services of Crime Prevention Security Services in Ocala, FL to provide security infrastructure for the process facility. The following proposal provides an initial description of the planned system. The estimate details the following equipment:

[redacted]

Part 3.C.4.a. Floor plan of each dispensing facility or proposed floor plans for proposed processing facilities including the following: i. Locking options for each means of ingress and egress; ii. Alarm systems; iii. Video surveillance; iv. Name and funct

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DISPENSARY IN RETAIL CENTER AT SHANDS SOUTH PARKING GARAGE

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G010 COVER SHEET

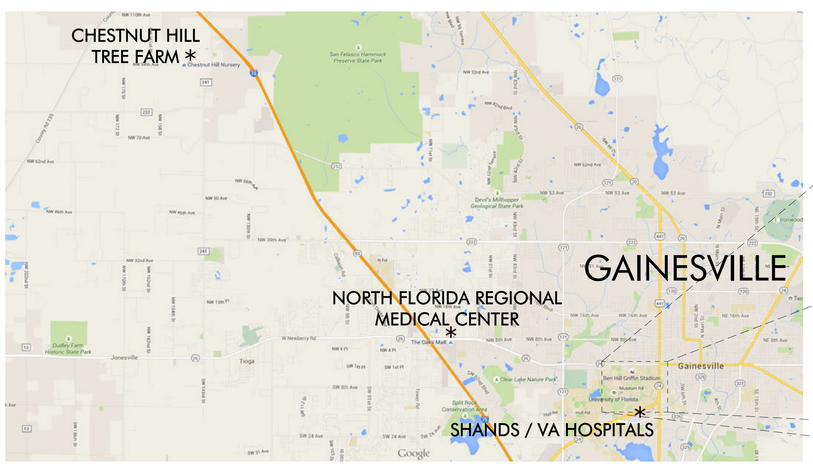
ARCHITECTURAL

A101 GROUND FLOOR PLAN

A102 GROUND FLOOR SECURITY PLAN

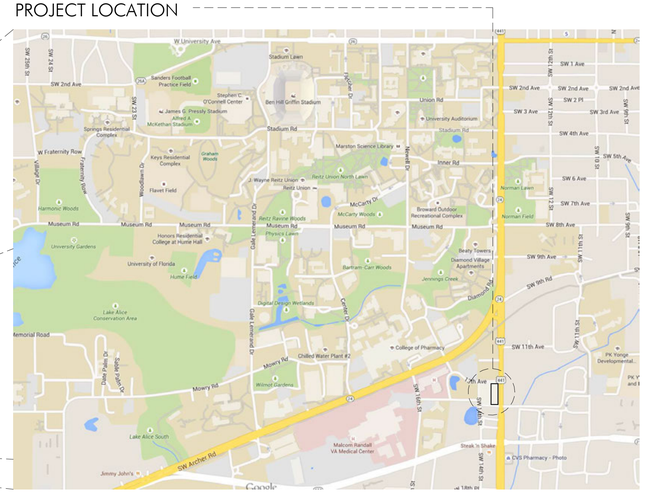
KEY PLAN

PROJECT VICINITY



LOCATION MAP

PROJECT LOCATION



CONSULTANT:

DISPENSARY IN RETAIL CENTER AT SHANDS SOUTH PARKING GARAGE

1334 SW 13TH STREET GAINESVILLE, FL

CONCEPT

WA PROJECT NO.:

DRAWN BY:

ISSUE DATE: 7/2/2105

REVISION SCHEDULE	
REVISION NO.	REVISION DATE

SHEET TITLE: COVER SHEET

SHEET NO.: G010

[redacted]

CONSULTANT:

DISPENSARY IN RETAIL CENTER AT SHANDS SOUTH PARKING GARAGE

1334 SW 13TH STREET GAINESVILLE, FL

CONCEPT

WA PROJECT NO.:

DRAWN BY:

ISSUE DATE:

7/2/2105

REVISION SCHEDULE	
REVISION NO.	REVISION DATE

SHEET TITLE:

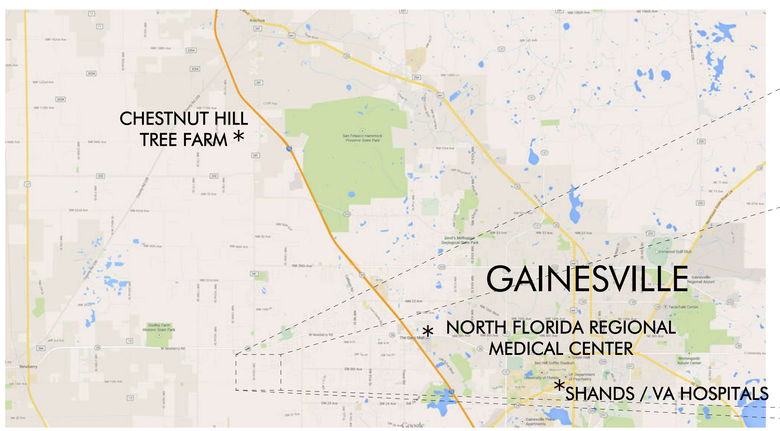
GROUND FLOOR SECURITY PLAN

SHEET NO.:

A102

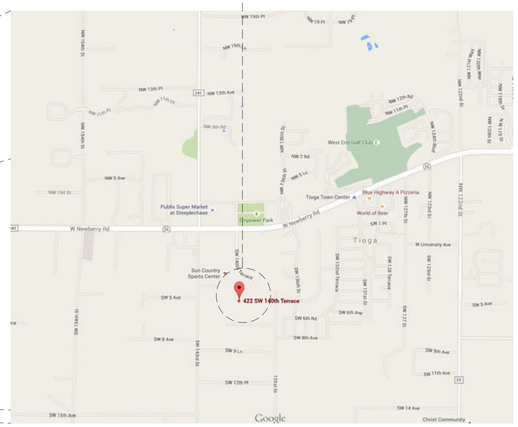
DISPENSARY AT 422 SW 140TH STREET NEWBERRY, FL

PROJECT VICINITY



LOCATION MAP

PROJECT LOCATION



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DISPNSARY AT 422 SW 140TH STREET

NEWBERRY, FL

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DISPNSARY AT 422 SW 140TH STREET

NEWBERRY, FL

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SITE PLAN

SHEET NO.:

A100

CONSULTANT:

DISPNSARY AT 422 SW 140TH STREET

NEWBERRY, FL

CONCEPT

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GROUND FLOOR SECURITY PLAN

SHEET NO.:

A102

Part 3.C.4.b. Storage including the following: i. Safes; ii. Vaults; and iii. Climate control

[redacted]

[redacted]

Part 3.C.4.b. Storage including the following: i. Safes; ii. Vaults; and iii. Climate control

Part 3.C.4.c. Diversion and trafficking prevention procedures for the dispensing facilities

OVERVIEW

Chestnut Hill Tree Farm intends to grow cannabis for medical use, and manufacture and distribute medical cannabis products, which are controlled substances with many incentives for diversion. Supply chain security is a top priority of the company and a primary job duty of all employees, reinforcing a company-wide culture of responsibility and accountability. The Security Officer will be responsible for the development and implementation of the anti-diversion policies and procedures, with managers responsible for oversight at each facility.

Diversion includes, but is not limited to employee or third-party theft or transfer of medical Derivative Products by an employee, patient, or caregiver to an unqualified individual. Best practice dictates that the company demonstrates control and security over its controlled substances inventory. The company has adopted multiple policies and procedures to prevent diversion and trafficking of the controlled substances they produce. Anti-diversion protocols paired with strict security and recordkeeping protocols will ensure that all medical cannabis materials are controlled throughout their life cycle.

Chestnut Hill Tree Farm will implement comprehensive policies and procedures to be implemented by the organization in order to ensure the prevention of diversion, abuse, and other illegal or unauthorized conduct relating to medical Derivative Products. Specifically all cannabis materials and medical Derivative Products will be stored in such a manner as to prevent diversion. The company will have an effective monitoring plan and a robust security system that prevents and detects diversion, theft, or loss of cannabis and medical Derivative Products.

Specific considerations regarding anti-diversion measures include methods for increased patient accountability along with methods for identifying, recording, and reporting diversion, theft, or loss, and for correcting all errors and inaccuracies in inventories.

BIOTRACKTHC

Upon propagation, BioTrackTHC automatically assigns a globally unique non-repeatable 16-digit barcode number to every plant. This barcode follows the plant through its entire product life cycle. The system will also track the precise location of every given plant within a designated room, bed or plant table using an ‘abc, 123’ grid base. Throughout the production process, the licensed producer may enter production notes into the plant-specific inventory record (i.e. events or any required notations that do not currently have pre-defined fields within the system). Upon harvest the system will batch designated plants together and assign a unique barcode to the collection, although the plants are grouped together during the harvest the individual plant barcodes are associated and cataloged within the batch inventory details. All flower, waste, sugar leaf, and other material will be collected, measured and associated appropriately to the original plant barcodes. These weights are also entered using vertically integrated scales to diminish the possibility of human error or manual manipulation. The system can also record both the wet and dry weights of flower material to track moisture loss percentages. The product can be notated and sampled at this juncture for testing purposes. Once testing results are retrieved, they can be directly associated with the product batches.

SPECIFIC DIVERSION PREVENTION PROCEDURES

EMPLOYEE BACKGROUND CHECKS

The company will not employ anyone with a history of theft or diversion based on a background check report. All employees will receive a Level 2 background check prior to employment. If an employee is identified who post-employment has been convicted of a felony involving theft or diversion or any felony of sale or possession of drugs, narcotics, or controlled substances, he or she will be terminated.

EMPLOYEE TRAINING
Extensive training of all employees will ensure that all staff is both knowledgeable of security and diversion issues and properly trained to comply with all required security measures. Manager training for employee management and oversight

ACCESS TO FACILITIES
No person, except a company employee, shall be allowed on the premises of any company facility unless they are an authorized visitor and escorted by an employee at all times. Visitor tracking, access to facilities by contractors, deliveries

EMPLOYEE ACCESS TO MEDICAL CANNABIS PRODUCTS
Access to cultivation areas is restricted to selected employees and regulators and based on their granted level of security access. Access to each separate functional area is granted to an employee based on his or her experience, tenure, and level of responsibility. Only manager level employees have access to cure and storage areas. All plant material from propagation to the transfer to manufacturing is tracked throughout the cultivation process. Transfers of cannabis will be:

- Approved by a director level employee,
- Fully documented in the inventory control system and by camera surveillance, and
- Limited to the internal manufacturing unit. No usable plant material may ever leave the production facility.

VISITORS ACCESS TO MEDICAL CANNABIS
Visitors will be handled in accordance with the company's visitor policies and procedures. Visitors will always be accompanied by authorized personnel and will never be granted access to cannabis materials or medical Derivative Product storage areas unless required for provision of services.

All persons who are not employees, certified patients, or designated caregivers, but who have been authorized by management to enter the facility shall obtain a visitor identification badge from a facility employee prior to entering the facility. An employee will escort and monitor the visitor at all times while the visitor is in the facility. The visitor identification badge shall be visible at all times. The facility will require the visitor to return the identification badge upon exiting the facility.

Each facility will maintain a visitor log, which shall include the name of the visitor, date, time and purpose of the visit. The visitor log shall be available to the OCU and law enforcement at all times during operating hours and upon request.

If an unforeseen circumstance requires the presence of a visitor and makes it impractical for a facility to obtain prior authorization from the OCU, the facility shall record in the visitor log, the name of the visitor, date, time, purpose of the visit and the facts upon which the access was granted.

INVENTORY MANAGEMENT AND POINT OF SALE SYSTEM
The inventory management and point of sale system provides additional opportunities to increase control over cannabis and medical Derivative Products. Managers will review entries and transactions in accordance with the specific schedule set in their department.

ENVIRONMENTAL SCANNING
The Security Officer will regularly review information from external sources including law enforcement, trade and patient associations, advocacy groups, list serves, and patients and caregivers related to factors that may impact the incentive for diversion (i.e. system-wide shortages, changes in law, rapidly increasing patient registrations, etc.).

If the Security Officer concludes that a change in diversion risk based on environmental factors exists, a risk mitigation plan will be developed and implemented.

PACKAGING AND LABELING

Medical Derivative Products will be packaged in child-resistant and tamper-proof or tamper-evident, light-resistant unit-dose (i.e. 1g concentrate or 50g CBD vape pen) packaging. For deliveries from the manufacturing facility to the dispensing facility, tamper-proof tape and single-use identification coding will be used to secure containers. All packaging and labeling will be in accordance with company policies and procedures for packaging, labeling, product storage, and delivery.

RECEIVING MEDICAL CANNABIS PRODUCTS

Two employees, one being a Security Officer, are required to receive any medical Derivative Products into inventory at any location. The entire transaction will be monitored by the Security Officer. Each employee will confirm by signature the accuracy of the delivery invoice, identification numbers, number of containers, the total inventory count received, and the accuracy of the entry of the inventory into the BioTrackTHC in accordance with the inventory management policies and procedures.

STORAGE OF EXPIRED AND DISPOSED MEDICAL CANNABIS PRODUCTS

All medical Derivative Products awaiting disposal will be stored in a locked container, in a secure area, recorded, and disposed of in accordance with the company's waste disposal policies and procedures.

REGULAR AUDITS REQUIRED

The performance of audits and inventory counts in accordance with the company's policies and procedures for inventory management, waste disposal, compliance, and audits ensures a quick resolution of discrepancies and errors. The Dispensary Manager will perform a periodic review of system administrators and responsible personnel to prevent diversion opportunities.

- Audit procedures will ensure a full inventory of Derivative Products in each location monthly, as a minimum requirement.
- The Dispensary Manager will develop and employ statistical measures utilizing historical data to evaluate the activities of all system users and purchases.
- Any inventory discrepancies discovered by any employee must be reported to the Dispensary Manager upon discovery. Any discrepancies discovered during a shift must be resolved before the end of the shift.
- The Dispensary Manager will report all unresolved inventory discrepancies to the OCU and law enforcement authorities as necessary.
- The Dispensary Manager will monitor unresolved inventory discrepancies on a daily basis and will approve the reconciliation entry of any inventory discrepancy.

REPORTING REQUIREMENTS

The Dispensary Manager will ensure that the inventory management and point of sale system provides reports that detail:

- A "total inventory in storage" by location and batch report that records user, date, time, item, quantity, and storage access in chronological order.
- An "all events" report that provides detail on all user activity and transaction types within a time frame, and tailored to specific data requirements, such as individual items or users.

- A “controlled substances vault compare” report that allows administrators to cross-reference the inventory that leaves the storage area and arrives at the shelf, dispensing facility, or any other location to the inventory at that location. Transactions that do not match show up on this report by location, item, quantity, date, time, and user.
- A “review send” report that provides detailed information regarding the removal of Derivative Products from the storage area, specifying the user, time, date, item, quantity, and intended destination.
- A “dispensing” report that provides detailed information regarding the transaction of Derivative Products at the dispensing facility, indicating the user, time, date, item, quantity, and inventory movement at the dispensing facility.
- A “purchase history” report that helps trend the receipt of Derivative Products into inventory and monitor purchase patterns.
- A “proactive controlled substances diversion” report that isolates above-average consumption of controlled substances, as determined by standard deviation.

[redacted]

Part 3.C.4.c. Diversion and trafficking prevention procedures for the dispensing facilities

[redacted]

[redacted]

Part 3.C.4.c. Diversion and trafficking prevention procedures for the dispensing facilities

[redacted]

[redacted]

Part 3.C.4.c. Diversion and trafficking prevention procedures for the dispensing facilities

[redacted]

Emergency Contacts

Emergency contacts will be posted at every facility. Phone numbers for the alarm company, surveillance company, fire department, police department, spill response team, poison control center, OCU contact, and 911 will be posted and updated as needed.

Changes to Security Plan

Any local law enforcement or OCU security directives will be incorporated into the security plan. Any changes to security protocols will be reviewed, approved by the Chief Operating Officer, and documented. Any changes will also be distributed to employees and re-training will be scheduled as soon as possible if required.

Communication with Law Enforcement

The Security Officer will maintain a list of non-emergency police department contacts for each facility. The Director will maintain regular communication with each contact advising of any changes in security procedures. The company intends to develop strong partnerships with local law enforcement agencies. The Security Officer will engage these agencies to support the company's security plans through collaborative training, observation patrols, rapid response to incidents, and proactive meetings.

Reporting Required

All employees are required to report any of the following incidents to their supervisor or the Security Officer. The Director will report such incidents to law enforcement and the OCU as necessary:

- An alarm activation or other event that requires a response by public safety personnel;
- The failure of any security alarm system due to a loss of electrical power or mechanical malfunction;
- Discrepancies identified during inventory, diversion, theft, loss, and any criminal action involving owners, managers, or employees;
- Unauthorized destruction of cannabis;
- Any loss or unauthorized alteration of records relating to cannabis inventory, patients, caregivers, or employees; and
- Any other breach of security that may present a continued threat.

Equipment Maintenance

The Security Officer will schedule and oversee all maintenance of security equipment in accordance with manufacturer recommendations. Any equipment failure identified will be corrected as soon as possible. All security equipment will be in good working order and will be inspected and tested at regular intervals.

ROBBERY PREVENTION MEASURES

Each facility and transportation vehicle is a high value target for burglars and robbers. A robbery in progress is an Incident and will be handled in accordance with this plan. The most effective way to ensure the safety and security of employees and patients is utilizing prevention strategies. All employees are required to have a good working knowledge of this Security Plan and to implement prevention measures into daily activities. Transportation of cannabis will be performed in accordance with transportation procedures.

[redacted]

Cash Management

- Each employee handling cash will be trained in the types of related incidents related to cash and is required to handle cash in accordance with the company's cash management and accounting procedures.
- The Chief Operating Officer is responsible for the development and implementation of cash management procedures.

INFORMATION TECHNOLOGY SECURITY

The IT Director is responsible for ensuring the security of the company's hardware, software, data, and communications networks. The Director is responsible for all IT maintenance including software registration, security patches, malicious software prevention, account management, security status, and network access monitoring, disposal and redeployment, employee IT security training and vulnerability assessments. All employee passwords for software and network access will be changed every six months. The IT Director will ensure system required password changes. Access to protected information will be restricted to essential personnel only. Examples of protected information include:

- Security and cash management procedures,
- Asset and inventory lists,
- Network data,
- Floor plans of critical areas,

- Password and code records,
- Patient and caregiver records, and
- Employee records.

The IT Director is required to identify and respond to all cyber security incidents. Incidents include natural disasters impacting technology infrastructure and unauthorized network access exposing protected information.

Part 3.C.4.d. A facility emergency management plan for the dispensing facilities

EMERGENCY & INCIDENT RESPONSE PROTOCOLS

Chestnut Hill Tree Farm has established procedures for addressing emergencies and incidents including natural disasters, fire, unauthorized facility access, theft, of Derivative Products or release of confidential information. Provisions for emergency and incident management, containment, and corrective measures are thoroughly detailed. The Chief Operating Officer is assigned responsibility for confirming the occurrence of an incident requiring the execution of this protocol and for ensuring the response protocol is followed.

The Security Officer will immediately notify appropriate law enforcement authorities within twenty-four hours after the discovery of a reportable incident. All incident response and emergency activities will be documented. All documentation related to a reportable incident will be maintained for no less than five years and made available, upon request, to OCU and to law enforcement authorities acting within their lawful jurisdiction.

The primary emphasis of activities described within this protocol is the return to a normalized (secure) state as quickly as possible, while minimizing adverse impacts to the company. The company's plan addresses incident identification, response protocols, containment activities, and corrective measures.

RESOURCES

Ready.gov

National Fire Protection Association

INCIDENT IDENTIFICATION & TRAINING

Types of Emergencies and Incidents

Types of incidents include, but are not limited to:

- Theft or physical loss of Derivative Products or confidential records;
- Robbery or unauthorized entry to the facility;
- Threats of violence to the facility, personnel or visitors; or
- Other incidents including:
    1. Bomb threats
    2. Fires
    3. Earthquakes
    4. Hazardous Materials Release
    5. Floods
    6. Windstorms
    7. Civil Disturbances
    8. Pandemic Flu
    9. Serious Accidents or Health Emergencies
    10. Criminal Activity

Incident Training Required

All employees will be required to receive incident management training upon hiring and annually in accordance with the staffing and training policies of the company. The Chief Operating Officer will ensure the adequate training of employees. Third-party trainers may be utilized as necessary.

ROLES & RESPONSIBILITIES

Employee Responsibilities

- Each employee will be familiar with the contents of this plan and will know the location of alarms, utility cabinets, fire extinguishers, emergency exits and first aid supplies.
- In the case of fire, if trained and safe to do so, extinguish the fire using a portable fire extinguisher.
- If a manager is not available to make an evacuation decision, all employees will make a determination with the health and safety of employees and visitors as the primary consideration.
- A gas leak in the production facility requires an evacuation until the fire department clears the facility.
- Do not re-enter the building or allow others to re-enter during an emergency. Stay with customers and other evacuated employees until interviewed by the unit manager or Chief Operating Officer.
- Each unit manager will maintain and visibly post a current emergency contact list and evacuation plan. All employees should save emergency contact numbers in their company or personal cell phones.
- Each unit manager will pre-plan an evacuation route, maintain and post the evacuation route map based on familiarity with the building and customer safety. Every employee will know the evacuation route and the location of the map. Always take the nearest stairwell.
- Regular review of facility floor plans and evacuation plan maps will be completed by the unit manager and updated as necessary.

Chief Operating Officer Responsibilities

To ensure an appropriate and timely execution of appropriate incident response, the Chief Operating Officer will:

- Develop and maintain this plan continuously. Identify potential hazards, develop mitigation strategies and improve the response protocols accordingly. Update unit managers and training programs as needed. Each facility will be stocked with an emergency preparation kit including provisions for sequestration in the facility if required.
- Maintain an updated emergency notification contact list. Maintain an internal contact list and employee notification system via email and text messaging.
- Visibly post all evacuation routes. Ensure all environmental detectors and alarms, emergency lighting and exit signs are operational.
- Confirm the occurrence of an incident requiring the execution of this protocol.
- Secure all products following any instance of diversion, theft or loss of cannabis and conduct an assessment to determine whether additional safeguards are necessary.
- Collect any evidence supportive of the event (unless law enforcement is required and collects evidence).
- Supervise and direct the consistent, timely and appropriate response to an incident.
- Provide appropriate communication to parties having a vested interest in the incident.
- Offer support to employees, customers or other interested parties as appropriate until the incident is resolved.
- Conduct a post-incident review and report making any necessary adjustments to security measures and procedures.

PROTOCOLS

Guidelines for All Employees

Reports of emergencies and incidents may come from outside parties, customers, other employees, news sources, direct observation or other sources. The primary objective for all employees is to determine if the problem being reported is an incident. In most instances, the problem being reported will not constitute an incident as defined within the protocol. However, the protocol can be a good guideline for dealing with other minor issues. No set of

protocols will address every circumstance; all employees will in good faith take all necessary and responsible actions.

Receiving External Reports

All employees are accountable for asking necessary questions about an incident, making a reasonable attempt at determining if an incident has occurred, recording facts and responses to questions and forwarding pertinent information to the unit manager or Chief Operating Officer immediately. If the employee cannot reach the managers, the Chief Executive Officer will be contacted. Duties include, but are not limited to:

- Familiarity with this protocol and the appropriate procedures.
- Individuals reporting problems and/or incidents to an employee should be informed as to the reason for the questions and all individuals should be encouraged to openly discuss the problem being reported.
- Any information provided by an individual that helps in the determination is of considerable value; the individual's cooperation is critical, greatly appreciated and should be recognized by the employee receiving the report.

Discovery and Internal Reporting

If the situation indicates that an incident may have occurred, employees should assume that an incident has actually occurred and perform the following activities:

- Obtain and record the contact information for the individual reporting the problem (name, telephone numbers and email address).
- Record relevant information about the incident (e.g., time/date of suspected occurrence, type of information compromised, location of the compromise) in the Incident Report Log.
- Inform the individual to expect contact from a member of management.
- Request the individual to treat the incident as a confidential matter.
- Notify the unit manager or Chief Operating Officer immediately of the incident.

Assessment and Escalation

Except in the case of an emergency needing immediate attention, the Chief Operating Officer will determine the category and severity of the incident and undertake discussions and activities to best determine the best course of action. All discussions, decisions and activities are to be documented as described herein. The Chief Operating Officer is responsible for making an early determination if an incident has occurred or might be indicated. If the employee cannot reach the unit manager or Chief Operating Officer, the Chief Executive Officer will be contacted as soon as possible.

Notification and Communication

The Chief Operating Officer will take action to notify the appropriate internal and external parties as necessary.

- Internal notification – the Chief Operating Officer will notify the Chief Executive Officer of an incident as soon as possible and then will notify other employees as necessary.
- External notification – unless responders will be notified in an emergency, all external notifications and communications will be approved by the Chief Executive Officer. External parties may include regulators, suppliers, customers, media or other affected parties.

Containment

The Chief Operating Officer, with the Chief Executive Officer if available, will determine and cause to be executed and the appropriate activities and processes required to quickly contain and minimize the immediate impact to personal safety, the company, customers and other affected parties. Containment activities are designed to:

- Minimize harm to individuals.
- Counteract the immediate threat.
- Prevent propagation or expansion of the incident.
- Minimize actual and potential damage.
- Restrict knowledge of the incident to authorized personnel.
- Preserve information relevant to the incident.

Corrective Measures

The Chief Executive Officer and Chief Operating Officer will determine and cause to be executed necessary activities in order to quickly restore circumstances to a normalized and secure state of operation. Corrective measures should be designed to:

- Secure the environment.
- Restore the environment to its normalized state.

Notification Required

Any employee with knowledge or a reasonable suspicion of an incident (i.e. theft or diversion) is required to make an immediate report to their unit manager, Security Officer, or Chief Operating Officer and record the incident in the incident report log. All incident activities, from receipt of the initial report through post-incident review, are to be documented by the Chief Operating Officer.

Internal Reporting Required

Reporting will include:

- A summary of the incident providing a general description of events, approximate timelines, the parties involved, resolution of the incident, external notifications required and recommendations for prevention and remediation.
- A description of incident events, indicating specific timelines, persons involved, hours spent on various activities, impact to affected parties, ensuing discussions, decisions and assignments made, problems encountered, successful and unsuccessful activities, notifications required or recommended, steps taken for containment and remediation, recommendations for prevention and remediation (short-term and long-term), identification of policy and procedure gaps, results of post-incident review.
- All relevant documentation will be retained by the Chief Operating Officer for archival in a cloud storage repository. Access to the documentation and repository is typically restricted to executive management and unit managers.
- Incidents will be documented by the Chief Operating Officer in accordance with the company's recordkeeping policies.

OCU and Law Enforcement Reporting Required

The Chief Operating Officer will immediately notify the OCU and appropriate law enforcement authorities as necessary after discovering the following:

- Discrepancies identified during inventory, diversion, theft, loss and any criminal action involving an owner, manager, or an employee that cannot be explained;
- Any suspicious criminal act involving the sale, cultivation, distribution, processing, or production of cannabis by any person known to the company;
- Unauthorized destruction of cannabis;
- Any loss or theft of Derivative Products during transportation;
- An alarm activation or other event that requires response by public safety personnel; and
- Any other major breach of security.
- All documentation related to an incident that is reportable will be maintained and made available to the OCU and to law enforcement authorities acting within their lawful jurisdiction upon request.

Post-Incident Review

A final review of incident-related activities is required.

- The Chief Operating Officer will hold a post-incident review meeting after each incident has been resolved; this discussion should be scheduled within 2-3 weeks of the incident's remediation. All affected parties are recommended participants.
- The review is an examination of the incident and all related activities and events. All activities performed relevant to the incident should be reviewed with an eye towards improving the over-all incident response process.
- Recommendations on changes to policy, process, safeguards, etc. are both an input to and by-product of this review. All discussion, recommendations and assignments are to be documented for distribution to the Chief Executive Officer and follow-up by the Chief Operating Officer.

Incident Closure

The Chief Operating Officer will stay actively engaged throughout the life of the incident to assess the progress/status of all containment and corrective measures and determine at what point the incident can be considered resolved. Recommendations for improvements to processes, policies, procedures, etc. will exist beyond the activities required for incident resolution and should not delay closing the incident, but will be implemented by the Chief Executive Officer.

CONTAINMENT ACTIVITIES

Incident Containment

The Chief Operating Officer will determine and execute the appropriate activities and processes required to quickly contain and minimize the immediate impact to the company, our customers and other stakeholders. The information below is a guideline for response and containment in various situations; however, all employees will use their best judgment when determining appropriate actions during an emergency incident. The health and safety of all persons will be the primary driver of any decision. Containment activities are designed with the primary objectives of:

- Counteracting the immediate threat.
- Preventing propagation or expansion of the incident.
- Minimizing the actual and potential damage.
- Restricting knowledge of the incident to authorized personnel.
- Preserving information relevant to the incident.

Fire

If the fire does not present an immediate danger to personal safety, one employee may try to extinguish the fire while one other employee stands-by, calls 911 and directs others out of the facility.

Natural Disasters

- Determine the extent of the disaster and need for evacuation or sequestration.
- Follow any direction given by local officials or law enforcement.
- Terminate all non-essential work functions and post necessary closure notices.
- Take precautions to secure all Derivative Products from the environment or possible looting.

Chemical Spill/Gas Leak

Chestnut Hill Tree Farm does not utilize any highly toxic chemicals in its operations. Gas leaks in any facility require an immediate evacuation until the fire department clears the facility. Gas leaks may include natural gas, CO_2, or propane. Any employee discovering a gas leak should shut off the gas source immediately and notify the unit manager to begin evacuation procedures. Nutrient spills are addressed in the cultivation policies. Employees should follow the direction of local officials in the case of an external spill impacting operations.

Evacuation Protocols

Any manager may determine the need to evacuate an area. Any employee is authorized to evacuate an area in a life threatening incident. Reasons for evacuation may include:

- Fire.
- Bomb threat.
- A hostile or violent employee, customer, visitor or unknown person.
- Power outage.
- Earthquake.
- Water or gas leak.
- Hazardous chemical spill.
- Robbery or hostage situation.

All employees will ensure that patients and visitors do not:

- Use elevators.
- Gather in lobbies.
- Bring disabled individuals into stairwells without fire department approval.
- Open a door without first checking for heat.
- Run or panic.
- Re-enter the building until authorized.

Disabled individuals or others who need assistance should:

- Be assisted by an employee.
- Be evacuated only under the direction of authorized emergency personnel or when there is an immediately threat to personal safety and security (i.e. Fire Department).

If applicable, preserve any and all evidence, if applicable and remain accessible for discussion with law enforcement personnel. Request witnesses to stay or provide their contact information. Do not touch any suspicious items or suspected bombs.

Damaged Cannabis Products

Each unit manager in coordination with the Quality Assurance Officer will ensure that cannabis materials or Derivative Products that have been subjected to improper storage conditions, including, without limitation, extremes in temperature, humidity, smoke, fumes, pressure, age or radiation due to natural disasters, fires, accidents or equipment failures, are not salvaged and distributed and are disposed of in accordance with the company's waste disposal policies. The unit manager may conduct salvaging operations only if there is:

- Evidence from laboratory tests and assays that the cannabis or Derivative Products meet all applicable standards of identity, strength, quality and purity; and
- Evidence from inspection of the premises that the cannabis or Derivative Products and their associated packaging were not subjected to improper storage conditions as a result of the disaster or accident, if any.

[redacted]

- Provide aid to injured people.
- Do not discuss the robbery with any outside parties until police and management has given authority to do so.
- Do not estimate the amount of money or product that was taken until an inventory has been performed.
- Notify the Chief Executive Officer of all cash or Derivative Product stolen and any actions taken.

[redacted]

UNAUTHORIZED IT ACCESS OR NATURAL DISASTERS IMPACTING PRODUCT OR EQUIPMENT

Activities that may be required to contain the threat presented to systems where unauthorized access or a natural disaster may have occurred. Engage a third-party IT specialist as needed.

[redacted]

CORRECTIVE MEASURES

Chief Operating Officer Responsibilities

The Chief Operating Officer will determine and cause the execution of the appropriate activities and processes required to quickly restore circumstances to a normalized (secure) state. Third-party security, IT or other necessary advisors should be engaged if necessary. Corrective measures are designed with the primary objectives of:

- Securing the environment, and
- Restoring the environment to its normalized state.

[redacted]

Part 3.C.4.d. A facility emergency management plan for the dispensing facilities

FACILITY CLOSURES

The Chief Operating Officer will manage any required facility closures ensuring that:

- Essential services are maintained to the extent possible even during an emergency.
- Minimum staffing levels are maintained.
- Required stakeholder communications are issued.
- An action plan for provision of essential services restoration of full services is developed and implemented immediately.
- A common area with food and bedding is provided for employees required to perform extended duty.
- Offsite employees support administrative tasks (time entry, scheduling, etc.).
- Non-essential meetings and travel is suspended.
- Telecommuting is implemented for applicable job functions.
- Sufficient and accessible infection control supplies (e.g. hand-hygiene products, tissues and receptacles for their disposal) are provided in all facility areas. Surface cleaning in common areas is sufficient.
- Work is re-prioritized and suspended if possible and contingency plans for major projects are implemented if possible.
- Essential operations are maintained, emergency assignments may be made to non-typical job classifications or third-parties as necessary.

Part 3.C.4.e. System for tracking Derivative Products throughout dispensing

BIOTRACKTHC

Upon propagation, BioTrackTHC automatically assigns a globally unique non-repeatable 16-digit barcode number to every plant. This barcode follows the plant through its entire product life cycle. The system will also track the precise location of every given plant within a designated room, bed or plant table using an 'abc, 123' grid base. Throughout the production process, the licensed producer may enter production notes into the plant-specific inventory record (i.e. events or any required notations that do not currently have pre-defined fields within the system). Upon harvest the system will batch designated plants together and assign a unique barcode to the collection, although the plants are grouped together during the harvest the individual plant barcodes are associated and cataloged within the batch inventory details. All flower, waste, sugar leaf, and other material will be collected, measured and associated appropriately to the original plant barcodes. These weights are also entered using vertically integrated scales to diminish the possibility of human error or manual manipulation. The system can also record both the wet and dry weights of flower material to track moisture loss percentages. The product can be notated and sampled at this juncture for testing purposes. Once testing results are retrieved, they can be directly associated with the product batches.

Each point of sale station requires the following hardware/software:

- ID Check and scanning – CR5400 – UV/ 2D / MSR / RFID DUPLEX ID SCANNER manufactured by 3M
- Brother Digital Wireless Color Laser All-In-One Printer, Scanner, Copier, Fax, MFC-9130CW
- HP Scanjet G3110
- DYMO Label Writer 450 DUO Label Printer
- Apg Series 100 Cash Draw
- Star TSP143II Thermal Receipt Printer
- Cash360 Note Recycler by G4S
- Microsoft Surface Pro tablets
- Futronic fingerprint scanners

A detailed description of inventory control policies is provided in the following section.

PRODUCT STORAGE AND DELIVERY

The company's policies and procedures for product storage and delivery to dispensing facilities and patients are exhaustive. Product storage requirements established by the company are developed with security and quality in mind, with measures included to ensure adequate lighting, ventilation, temperature, humidity, product quality and stability, space, and equipment. Separate areas for storage of Derivative Products that are outdated, damaged, deteriorated, mislabeled, or contaminated, or whose containers or packaging have been opened or breached, are identified and described.

The Medical Director and the Dispensary Managers will be responsible for developing, implementing, and maintaining storage area procedures that ensure compliance with required processes. All storage areas will be maintained in a clean and orderly condition, will be free from infestation by pests of any kind, and will operate in accordance with security requirements established by the Security Director. All safes, vaults, and any other equipment or areas used for the storage of Derivative Products will be securely locked and protected from entry at all times, except for the actual time required to remove or replace products. Surveillance camera(s) will be pointed directly at storage areas with an unobstructed field of view.

Additional provisions address procedures to ensure adequate shipment verification, shipping manifests, loading areas, route planning, cargo theft prevention measures, two-way radio communication, and required transportation reporting. The Security Director is responsible for ensuring the reporting of all transportation events.

The Security Director, in coordination with information from law enforcement and utilizing third-party security advisors, will identify "security risk geographies" related to local crime rate, educational system, political consideration, and legal conditions hindering or supporting cargo theft. Any vehicle accidents, diversions, losses, or other reportable incidents that occur during transport will be reported to the OCU and local law enforcement within 24 hours as necessary.

STORAGE REQUIREMENTS

- The Dispensary Manager is responsible for ensuring compliance of all storage areas.
- Adequate lighting, ventilation, temperature, humidity, space, and equipment will be provided.
- Separate areas for storage of Derivative Product that is outdated, damaged, deteriorated, mislabeled, or contaminated, or whose containers or packaging have been opened or breached, until such products are destroyed will be provided.
- All storage areas will be maintained in a clean and orderly condition.
- All storage areas will be free from infestation by insects, rodents, birds, and pests of any kind.
- All Derivative Products will be returned to a secure, locked area at the end of the business day.

DISPLAY OF MEDICAL CANNABIS PRODUCTS

The dispensing facility may display, in secure, locked cases, no more than one sample of each product offered for sale. These display cases may be transparent.

STORAGE AREAS MUST REMAIN SECURED

All safes, vaults, and any other equipment or areas used for the storage of Derivative Products are securely locked and protected from entry at all times, except for the actual time required to remove or replace Derivative Products. Surveillance camera(s) will be pointed directly at each storage area and the camera's field of view will not be obstructed.

PRODUCT STORAGE ENVIRONMENTAL CONTROL
Storage facilities will be designed and maintained to be dry, well-ventilated, and have sufficient insulation or other temperature-control features to avoid extreme temperature fluctuations. The company may incorporate a humidifier or de-humidifier, if needed. Storage areas will utilize and maintain carbon filtration or other means of odor control.

SHIPMENTS FROM MANUFACTURING FACILITY TO DISPENSING FACILITIES
Deliveries to dispensing facilities will be in accordance with the transportation and distribution policies and procedures, OCU regulations, and state and local laws. Only approved Derivative Products that are ready for sale will be transported from a processing facility to dispensing facilities. All deliveries to dispensing facilities will be approved by the Security Director and be accompanied by a shipping manifest.

MANIFEST REQUIREMENTS

- The employee responsible for packaging a delivery order will complete a shipping manifest in a form and manner determined by the Chief Operating Officer, for retention by the origination location.
- A copy of the shipping manifest will be transmitted to the dispensing facility that will receive the products prior to transport.
- A copy of the shipping manifest will be included with the products being transported.
- An original signature will be obtained on the shipping manifest from the dispensing facility recipient.
- Documented in BioTrackTHC
- Hard copies of shipping manifests will be retained for no less than five years and made available to the OCU or law enforcement upon request.

DELIVERY AREAS
Areas used to unload Derivative Products at a dispensing facility will be limited access areas and will be secure. The Dispensary Manager, in coordination with the Security Officer, will ensure and maintain security in all delivery areas. The delivery areas will be secured as follows:

- Physical barriers, including a security lobby, guarding against unauthorized access to the area.
- Access control points will include the positive identification of all employees and service providers at all points of entry.
- Video surveillance of delivery areas
- The alarm system will provide silent alarm capability and full coverage video surveillance of all delivery areas.
- The Dispensary Manager, in coordination with the Human Resources Manager, will authorize access to delivery areas and issue employee keys and codes.

SHIPMENT VERIFICATION
Beginning immediately upon arrival to a dispensing facility and no later than twelve hours (seems long? 8 hours for inspection below) after arrival, two employees, one being a manager, will, under video surveillance:

- Inspect shipping containers for evidence of tampering.
- Inspect all Derivative Product packaging for evidence of tampering.
- Account for all products listed on the shipping manifest.
- Enter products into the inventory management and point of sale system.

RECEIVING MEDICAL CANNABIS PRODUCTS INTO INVENTORY.

- Beginning immediately upon arrival to the dispensing facility and ending no later than eight hours after arrival, two employees, one being a manager, must inspect Derivative Product packaging for tampering, inventory, and account for on video and in the inventory system all Derivative Products.

- Each employee must confirm by signature the accuracy of the delivery invoice, identification numbers, number of containers, the total inventory count received, and the accuracy of the entry of the inventory into the BioTrackTHC or point of sales system. Containers will be physically examined for evidence of tampering.

- Any discrepancy will be reported to the Dispensary Manager immediately for investigation. Unresolved discrepancies will be reported as required in the reporting and notifications policies and procedures.

INVENTORY MANAGEMENT AND WASTE DISPOSAL

The Security Director and the Medical Director are responsible for developing and implementing operational procedures for inventory management and waste disposal that are in compliance with local regulations and state and local law. The Dispensary Manager is responsible for oversight of all inventory management activities and for implementing and enforcing the policies and procedures at the dispensing facility. The Medical Director and the Dispensary Managers will ensure the company's cumulative inventory of approved Derivative Products reflects the projected needs of qualified patients.

The Medical Director will ensure the inventory management and point of sale system, BioTrackTHC, is accurate and capable of producing, upon request, reports on all Derivative Products stored. All inventory policies and procedures relevant to the receipt and dispensing of Derivative Products are comprehensively addressed by the company.

All waste, including waste composed of or containing Derivative Products, will be stored, secured, and managed in accordance with applicable state and local laws and regulations. Additional waste disposal provisions include detailed plans for excess product disposal, liquid, and solid waste disposal based on local ordinance, composting practices, and the disposal of expired, contaminated, or otherwise unusable Derivative Products. The dispensary will secure all Derivative Product waste for return to the cultivation facility. All waste will be manifested for transport and handled in accordance with all company transportation policies.

Discrepancies identified during inventory, diversion, theft, loss, and any criminal action will be reported to the Medical Director, the Security Director, and the OCU and law enforcement if necessary. The Dispensary Manager will also report any verifiable incident of unauthorized destruction of Derivative Products as needed.

INVENTORY LIMITS

The Dispensary Manager is responsible for ensuring that the dispensing facility's cumulative inventory of Derivative Products reflects the projected needs of the dispensary's patients. Beginning inventories will be established based on demand projected in the company's business plan. Inventory limits will be adjusted by the Dispensary Manager, in coordination with the Medical Director, to anticipate future patient needs.

REAL-TIME INVENTORY REQUIRED

The Dispensary Manager is responsible for the accurate real-time reporting of Derivative Products inventory including:

- Medical Derivative Products ready for dispensing.
- All damaged, defective, expired, or contaminated or returned Derivative Products awaiting disposal.

INVENTORY CONTROLS AND PROCEDURES

The Dispensary Manager, in coordination with the Inventory Manager, will regularly conduct inventory reviews, and comprehensive inventories of all Derivative Products stored. The Dispensary Manager will make all necessary

changes to procedures and re-train personnel immediately upon discovering any problems in inventory management procedures.

- Each dispensing facility will maintain an inventory log to record:

- The date of each inventory process;
- A summary of the inventory findings; and
- The names, signatures, and titles of the individuals who conducted the inventory.

CYCLE COUNTS REQUIRED
Each dispensing facility will maintain an inventory log to record:

- Shift counts – Derivative Products in sales area, as well as cash drawer count and detailed report on cashless ATMs.
- Daily counts – Derivative Products in the sales area.
- Weekly counts – Derivative Products in storage.
- Monthly counts – complete inventory.
- Semi-annual counts – complete inventory and second count.
- Annual counts - complete inventory and with second count witnessed by the Medical Director.

GENERAL WASTE DISPOSAL REQUIREMENTS
All waste composed of or containing Derivative Products, will be stored, secured, and managed in accordance with applicable state and local laws and regulations. All waste disposed of will be recorded in a waste disposal log and returned to the cultivation facility for disposal, including:

- The date of disposal;
- The type and quantity disposed of;
- The manner of disposal;
- The reason for disposal; and
- The name of the certified patient or designated legal representative who supplied the waste, if applicable.

EXCESS PRODUCT DISPOSAL
Any Derivative Product that is not needed for normal, efficient operation in order to serve the projected needs of qualified patients will be disposed in accordance with waste disposal policies and procedures. The Medical Director, in coordination with the Dispensary Manager, will determine and document the need for excess inventory disposal. Transfer to other dispensing facility?

QUALITY CONTROL WASTE DISPOSAL
The Dispensary Manager is responsible for ensuring the quality and safety of Derivative Products in the dispensing facility's inventory on a daily basis. The Dispensary Manager will ensure that expired, contaminated, or otherwise unusable Derivative Products are disposed of in accordance with waste disposal policies and procedures and properly recorded in BioTrackTHC.

WASTE RECEIVED FROM CERTIFIED PATIENTS AND DESIGNATED LEGAL REPRESENTATIVES
The company will accept unused, excess, or contaminated Derivative Products from qualified patients or designated legal representatives, and will manage this waste according to the applicable policies and procedures of the company while maintaining a written record of such disposal in the waste disposal log, which will include the name of the certified patient or designated legal representative, if applicable.

UNAUTHORIZED DESTRUCTION OF MEDICAL CANNABIS PRODUCTS

Any employee will report the unauthorized destruction of Derivative Products to the Dispensary Manager. The Dispensary Manager will report any verifiable incident to the Medical Director and the Security Director to investigate the incident and determine the outcome.

PACKAGING AND LABELING

All packaging and labeling of Derivative Products will be in accordance with the company's policies and procedures based on cGMP and FDA standards. No employee may alter, obliterate, or destroy any label attached to a Derivative Product container or package, or open any Derivative Product packaging. The Dispensary Director or Manager are the only employees authorized to make changes to any label in the dispensary.

All Derivative Products will be packaged and labeled in the processing facility in accordance with the company's packaging and labeling policies and procedures, and packaged in child-resistant containers. Prior to patient or legal representative's departure from the facility, all purchases will be labeled with the appropriate label generated by BioTrackTHC with patient instructions for use, and placed in a sealed and plain exit package that includes all of the appropriate product information insert(s) inside the sealed package.

PACKAGING REQUIREMENTS

All Derivative Products delivered to the company's dispensing facilities will be packaged in such a manner that they are child-resistant, tamper-proof/tamper-evident, light-resistant, and in a re-sealable package that minimizes oxygen exposure. The company will identify each lot of approved Derivative Product with a unique lot identifier. The original seal will not be broken except by the company for quality evaluations, by the OCU, or by the certified patient or designated legal representative. No product with a broken seal, regardless of the reason, will be distributed to patients.

QUANTITIES PACKAGED

The Medical Director and the Manufacturing Director, in coordination with the Dispensary Manager, will determine the quantity of Derivative Product packaged in each unit based on patient and product need data.

PACKAGING MATERIALS

Only food- or pharmaceutical-grade packaging materials will be utilized for Derivative Products. Packaging materials for consumer health products/neutraceuticals?

INVENTORY MANAGEMENT AND POINT OF SALE SYSTEM LABELING

Medical Derivative Product labels will be approved by the Quality Assurance Officer prior to use. Some labeling will be printed by BioTrackTHC at the time of sale in addition to the standard labeling applied at the processing facility. The Dispensary Manager will ensure labels meet all requirements prior to distribution. Any Derivative Product that is improperly labeled will be returned to the cultivation facility for disposal.

DISPENSING FACILITY LABELING

The dispensing facility will affix to the approved Derivative Product package a patient-specific dispensing label that is easily readable, firmly affixed, and includes:

- The name and registry identification number of the certified patient and designated legal representative (if any);
- The ordering physician's name;
- The dispensing facility name, address, and phone number;
- The dosing and administration instructions;

- The description of the product, quantity and date dispensed; and
- Any recommendation or limitation by the physician as to the use of Derivative Product(s).
- Expiration date of the product and any special handling and/or storage requirements

PRODUCT INFORMATION INSERTS

The dispensing facility will include a product information insert with each product package dispensed. Information provided will include, but not be limited to:

- The Derivative Product and brand;
- A list of any excipients used;
- A warning if there is any potential for allergens in the Derivative Product;
- Contraindications and precautions;
- General dosage directions and instructions for administration;
- Mechanism of action and potential effects in the treatment of specific diseases
- Warning of adverse effects and/or any potential dangers stemming from the use of Derivative Products;
- Specific instructions for reporting adverse effects to the dispensary (call center) and ordering physician; when patient should contact their physician or emergency center first
- Information on tolerance, dependence, withdrawal, and substance abuse;
- Information on how to recognize what may be problematic usage of Derivative Products and how to obtain appropriate services or treatment;
- Advice on how to store the product and keep the product secure;
- Language stating that the certified patient may not distribute any Derivative Product to anyone else;
- Language stating that unwanted, excess, or contaminated Derivative Product should be returned to the dispensary; and
- Language stating that “this product is produced without FDA oversight, limited scientific information on the side effects of using this product exist, and there may be associated health risks.” – perhaps balance with provision of product in accordance with FL Statutes and in partnership with OCU to ensure access to investigational products with suspected medical uses

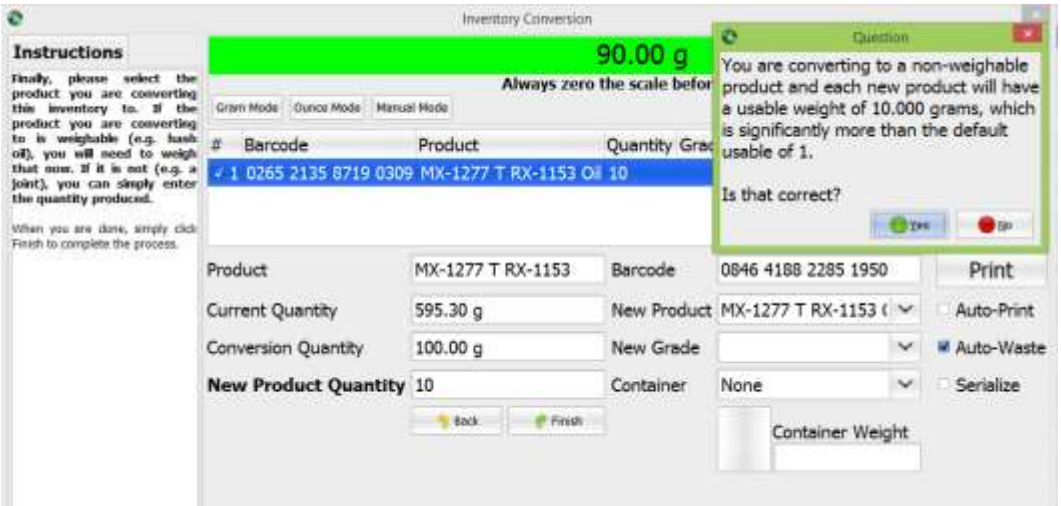
All inserts must be approved by the Medical Director prior to the first distribution. Copies of product information inserts that are distributed to patients are kept on file at for a minimum of five years. Patients and ordering physicians notified of any material changes to product labeling.

Part 3.C.4.f. Inventory control system for Derivative Products

BIOTRACKTHC

BioTrackTHC's industry leading software was designed specifically for the medical cannabis industry. Every transaction is tracked via employee PIN or biometric fingerprint ensuring complete visibility and chain of custody. Every gram is tracked from seed to sale, recording the entire plant life cycle and who interacted with it at each step. The tracking continues through plant harvest and processing recording each part of the plant, be it flowers or byproducts to be broken down into extracts or oils. All transactions are archived for future reference ensuring complete security, traceability, and accountability.

While BioTrackTHC does not handle the physical processing of the plant material; it does track the plant, and plant material, through the process via the 16 digit non-repeatable barcode. Throughout processing, the system creates new 16 digit barcodes recording the transaction and linking to the previous code. This protocol is repeated at each processing transaction creating an unbroken record of the entire product cycle, from seed to sale. Processes, employees, and time stamps are recorded to the 16 digit identifier creating a detailed account of all plant interactions.



Finalized end products and intermediate conversion products can be created though the system's inventory control module. These can be anything from, but not limited to, infused raw oils, edibles, concentrates or prepackaged flower. In addition to entering the product, the predetermined amounts of Derivative Products product within each individual item can be selected. Once entered into the system they will be available in a drop down of eligible conversions within the module itself. During the conversion the system will track the end quantities of the new product, associated waste, and even warn the employee if the suspected infusion quantity is below or exceeds the preselected amounts.

Inventory Audit

Product	Barcode	Old qty	New qty	Difference	Percent	Date
AK-47						
	0129 3807 1592 7867	626.00	626	0.00	0.00	09/16/2014 04
	9498 6908 4835 7565	1445.00	1445	0.00	0.00	09/16/2014 04
	0785 1262 5028 8317	1023.00	1023	0.00	0.00	09/16/2014 04
		3094	3094	0.00	0.00	
AK-47 14G PrePack						
	1765 6039 0269 5149	19.00	19	0.00	0.00	09/16/2014 04
	4263 4025 1220 5789	20.00	20	0.00	0.00	09/16/2014 04
	3219 0714 5137 3585	49.00	49	0.00	0.00	09/16/2014 04
		88	88	0.00	0.00	
AK-47 1G PrePack						
	8165 0818 7138 3716	109.00	109	0.00	0.00	09/16/2014 04
	8864 0848 3592 1099	98.00	98	0.00	0.00	09/16/2014 04
	8557 5634 2531 0431	86.00	86	0.00	0.00	09/16/2014 04
	6475 5090 8044 1748	70.00	70	0.00	0.00	09/16/2014 04
	3980 0831 9570 5042	50.00	50	0.00	0.00	09/16/2014 04
	6907 4877 8047 7931	200.00	200	0.00	0.00	09/16/2014 04
	5666 8886 6878 1019	100.00	100	0.00	0.00	09/16/2014 04
	3945 5163 4101 4937	79.00	79	0.00	0.00	09/16/2014 04

Every new conversion is given a new non-repeatable barcode; however it can be easily hierarchically and chronologically linked with the preceding product state. Sublotting batches will also generate additional barcodes; however the previous barcodes as well as any previously associated testing and notation information will still be readily available.

The aforementioned information can be found in both the system's inventory conversion report and inventory forensics report. BioTrackTHC has the inclusive capabilities to track all measurable aspects of a Derivative Products plant. In addition to the literal weights of the cannabis, the system can associate 'usable Derivative Products' quantities with any created infused Derivative Products products. The system's product conversion tools enable the quantities of usable Derivative Products as well as associated conversion wastes to be tracked with ease. This ensures that whether the plants and/or plant products are in their relative cultivation or processing phases, they can be fully accounted for and tracked.

INVENTORY CONTROL

The Chief Operating Officer in coordination with the Inventory Manager is assigned responsibility for the oversight of all inventory management activities and for implementing and enforcing the company's policies and procedures. All managers will work collaboratively to assure that inventory is tracked from seed to sale, counted and recorded at required intervals, and that any discrepancies are reported to the appropriate authorities.

The company's inventory management and point of sale systems will be accurate and capable of producing, upon request, reports on all cannabis and products in production, finished and stored. Cycle counts are required and will be recorded in the inventory log. Required shift, daily, weekly, monthly, semi-annual, and annual inventory counts in the dispensary, cultivation, and manufacturing facilities will be executed. All inventory policies and procedures relevant to the acquisition, receipt and distribution of cannabis are comprehensively addressed.

Discrepancies identified during inventory counts that are not due to documented causes will be reported to the Chief Operating Officer and the causes will be investigated. Any suspected cases of diversion, theft, loss, and any criminal action involving the company or an employee will be reported to the Chief Operating Officer. The Chief Operating

Officer will also report any verifiable incident of theft or loss of cannabis to the OCU and law enforcement, as necessary.

RESPONSIBILITY FOR INVENTORY CONTROL

- The Chief Operating Officer is responsible for oversight of all inventory management and control.
- The Chief Operating Officer shall designate in writing an employee who has oversight of the inventory control system for each licensed company facility under the Inventory Manager's supervision.
- Unless otherwise designated by the Chief Operating Officer, each unit manager is responsible for the accurate recording of all inventory transactions in their unit.

INVENTORY LIMITS

- The Chief Operating Officer will ensure the cumulative inventory cannabis materials is maintained in accordance with regulations.
- Beginning inventories for each unit shall be established based on demand projected in the business plan of company.
- Inventory limits shall be adjusted by the Chief Operating Officer in coordination with the unit managers to anticipate future inventory needs.

REAL-TIME INVENTORY REQUIRED

- The Inventory Manager, in coordination with the unit managers, is responsible for the accurate real time reporting of cannabis inventory.
- The system utilized in each location will report daily beginning and ending inventory including:
  1. Cannabis plants in any phase of development such as propagation, vegetation and flowering;
  2. Cannabis ready for dispensing;
  3. Derivative Products in process;
  4. Derivative Products ready for dispensing;
  5. All damaged, defective, expired or contaminated cannabis and Derivative Products awaiting disposal;
  6. Acquisitions;
  7. Harvests;
  8. Sales;
  9. Disbursements; and
  10. Disposals of unusable, returned, or recalled cannabis.

INVENTORY CONTROLS AND PROCEDURES

- The Chief Operating Officer in coordination with the Inventory Manager and unit managers shall regularly conduct inventory reviews and comprehensive inventories of all cannabis and Derivative Products in production, finished and stored.
- A seed-to-sale methodology will be utilized by the company at all times.
- The Chief Operating Officer shall make all necessary changes to procedures and re-train personnel immediately upon discovering a problem in inventory management procedures.
- Each unit manager shall maintain an inventory log to record:
  1. The date of an inventory process;
  2. A summary of the inventory findings; and
  3. The names, signatures and titles of the individuals who conducted the inventory.

INVENTORY RECORDKEEPING

- The Inventory Manager will oversee the documentation of all inventory procedures in coordination with the unit managers to be reviewed by the Chief Operating Officer.

- The company will utilize a cloud based document management system and server based inventory control system, BioTrackTHC.
- All inventory documentation required will be retained by each facility for at least five years.
- Records will be made available to the OCU upon request as required.

RECEIVING

RECEIVING CANNABIS AND DERIVATIVE PRODUCTS

- Immediately upon arrival to any company facility, two employees, designated by the unit manager as able to receive inventory, will re-weigh, re-inventory and account for on video and in the inventory system all cannabis and Derivative Products.
- Containers should be physically examined for evidence of tampering.
- Any products that show evidence of tampering or that are not accompanied by the appropriate documentation will be rejected and may not be received into inventory.
- The unit manager will be notified immediately of any shipment refused or that needs to be returned.
- Each employee will confirm by signature the accuracy of the delivery invoice, identification numbers, number of containers, the total inventory count received and the accuracy of the entry of the inventory into the BioTrackTHC or point of sales system.
- All Derivative Product will be accompanied by the name and license number of the cultivation facility, the lot number, net weight, associated laboratory test results, and a list of all pesticides applied to the product.

DISCREPANCIES

- Any discrepancy will be reported to the unit manager immediately to be investigated and resolved with the originator of the shipment.
- Unresolved discrepancies will be reported to the Inventory Manager as required by the company's recordkeeping policies and procedures.

RECEIVING PRODUCT INTO THE POINT OF SALE SYSTEM

- Receipt of cannabis, Derivative Products and cannabis plants will be recorded in the inventory control system.
- The following information will be recorded:
  1. A description of the Derivative Products acquired, including the amount, strain and batch number and all testing data provided;
  2. The name and identification number of the license of the facility shipping the Derivative Products;
  3. The name and identification card number of the employee delivering the Derivative Products;
  4. The name and identification card number of the employee receiving the Derivative Products on behalf of the unit; and
  5. The date of acquisition.
- When receiving ingestible Derivative Products, the following information will also be recorded:
  1. A description of the ingestible Derivative Products received including all testing data provided;
  2. The total estimated cannabinoid content and batch number of cannabis materials used in the edible Derivative Products;
  3. The name and identification number of the license of the facility shipping the Derivative Products;
  4. The name and identification card number of the employee delivering the Derivative Products;
  5. The name and identification card number of the employee receiving the Derivative Products on behalf of the unit; and
  6. The date of acquisition.

INVENTORY COUNTS

Cycle Counts Required

- The Chief Operating Officer shall direct unit managers to perform inventory counts on a regular basis utilizing a cycle count method.
- A cycle count requires the unit manager perform a complete count of the inventory over a period of time counting inventory groups (i.e. clones, mothers, flowering by room, finished flower, curing flower, edibles, topicals, etc.) individually.
- Each unit manager shall ensure that cycle counts are completed on schedule with minimal possible impact on regular operations.
- The same employees shall be assigned to recurring inventory groups whenever possible. However, employees should not consistently be responsible for one inventory area.
- The unit manager will review any discrepancies and approve all BioTrackTHC adjustments.
- Discrepancies identified during inventory, diversion, theft, loss and any criminal action involving company or an employee; will be reported to the Chief Operating Officer and the OCU in accordance with the company's recordkeeping policies.
- All counts will be recorded in an inventory log and entered into the BioTrackTHC or point of sale system immediately if counted on paper or by recording device.

Required Counts in the Dispensary

- Shift counts - cannabis flower, concentrate in sales area, as well as cash drawer count and detailed report on credit cards and cashless ATMs, if applicable
- Daily counts – cannabis flower and concentrate in sales area
- Weekly counts – bulk cannabis flower and concentrate in storage, all Derivative Products, and vaporizers
- Monthly counts – complete inventory
- Semi-annual counts – complete inventory and with second count
- Annual counts - complete inventory and with second count witnessed by the Inventory Manager

REPORTING

Inventory Discrepancies

- If the unit manager identifies a reduction in the amount of cannabis in the inventory of the cannabis establishment not due to documented causes, it will be reported to the Inventory Manager and Chief Operating Officer.
- The Inventory Manager in coordination with the unit manager shall determine where the loss has occurred and take and document corrective action.
- If the reduction in the amount of cannabis in the inventory is due to suspected criminal activity by an employee, the Chief Operating Officer shall report the employee to the appropriate law enforcement agencies as required by regulation.

Theft and Loss

- If any loss or theft is verified, it will be documented by the Chief Operating Officer and reported to the local enforcement agency and OCU as necessary by regulation or at the Chief Operating Officer's discretion.
- Documentation of the theft or loss will be maintained for at least five years and provided to law enforcement or the OCU upon request.

DERIVATIVE PRODUCT STORAGE

The BioTrackTHC will be used to document cannabis and Derivative Products in storage. Product storage requirements established by the company are thoroughly addressed, with measures included to ensure adequate lighting, ventilation, temperature, humidity, space, and equipment. Separate areas for storage of cannabis that is outdated, damaged, deteriorated, mislabeled, or contaminated, or whose containers or packaging have been opened or breached, are identified and described.

The Chief Operating Officer will be responsible for developing, implementing and maintaining storage area procedures for each unit that ensure compliance with required processes contained herein. Each unit manager is responsible for establishing control areas or systems to prevent product contamination during the production process. The four secure storage locations used during cultivation processing are discussed and those with access are listed.

It is established that all storage areas will be maintained in a clean and orderly condition, free from infestation by pests of any kind and in accordance with security requirements established by the company. All safes, vaults, and any other equipment or areas used for the production, cultivation, harvesting, processing, or storage of cannabis and Derivative Products will be securely locked and protected from entry at all times. Surveillance camera(s) will be pointed directly at storage areas with an unobstructed field of view.

PRODUCT STORAGE

General Storage Requirements

The Chief Operating Officer in coordination with unit managers and quality control unit is responsible for ensuring compliance of all storage areas.

- All Derivative Products will be stored in an enclosed and locked facility where no toxic or flammable materials are kept.
- Adequate lighting, ventilation, temperature, humidity, space, and equipment will be provided in all Derivative Product storage areas with oversight by the quality control unit.
- Separate areas for storage of cannabis that is outdated, damaged, deteriorated, mislabeled, or contaminated, or whose containers or packaging have been opened or breached, until such products are destroyed will be provided in each unit.
- All storage areas will be maintained in a clean and orderly condition.
- All storage areas will be kept free from infestation by insects, rodents, birds, and pests of any kind.
- All storage areas will be maintained in accordance with security policies and procedures.

Secure Product Storage Required

The Chief Operating Officer in coordination with the Security Officer and unit managers shall be responsible for monitoring and restricting access to secure storage of cannabis. The Chief Operating Officer shall develop, implement, and maintain storage area procedures that ensure the following processes:

- All cannabis in the process of cultivation, production, preparation, transport, or analysis will be housed and stored in such a manner as to prevent diversion, theft, or loss.
- Any cannabis items such items will be accessible only to the minimum number of specifically authorized employees essential for efficient operations.
- Access to Derivative Products will be restricted by the Chief Operating Officer of Security Director. Only necessary personnel will receive access rights to areas housing security equipment, cannabis, Derivative Products or cash.

- All cannabis and Derivative Products will be returned to a secure, locked area at the end of any process (i.e. trimming, manufacturing, etc.) or and at the end of the day (i.e. dispensary products on display).
- All cannabis and Derivative Products will be stored separately with suitable identification the labels and other labeling materials for each type of cannabis or Derivative Product, and the different strength, dosage form or quantity of contents.

Product Storage Areas Security

All employees will ensure that safes, vaults, and any other equipment or areas used for the production, cultivation, harvesting, processing, or storage of cannabis and Derivative Products are securely locked and protected from entry at all times, except for the actual time required to remove or replace cannabis. [redacted].

Environmental Control Required

The Chief Operating Officer in coordination with the quality control unit and unit managers will ensure that storage areas holding cannabis and Derivative Products are maintained to be dry, well ventilated, and have sufficient insulation or other temperature-control features to avoid extreme temperature fluctuations.

- The company shall incorporate a humidifier or de-humidifier if needed to ensure product quality.
- Storage areas will utilize and maintain carbon filtration or other means of odor control as necessary.

High Contamination Risk Storage and Transportation

Products that can support the rapid growth of undesirable microorganisms as determined by the unit manager or quality control unit will be held in a manner that prevents the growth of these microorganisms.

- Storage and transportation of finished products will be under conditions that will protect them against physical, chemical, and microbial contamination as well as against deterioration of them or their container.
- The unit manager and Transportation Manager in coordination with the quality control unit will ensure that all high risk products are safely stored and transported.

DISPENSARY STORAGE
Minimum Requirements

The dispensary manager will ensure that cannabis and Derivative Products in the dispensary unit are stored in a secure, locked device, display case, cabinet or room within the enclosed, locked facility. The secure, locked device, display case, cabinet or room will be protected by a lock or locking mechanism that meets at least the security rating established by Underwriters Laboratories for key locks.

Overnight Storage

It is company policy to remove all cannabis and Derivative Products from the sales area after each business day and store these products in a vault or locked storage room.

Removal from Storage

Cannabis and Derivative Products may only be removed from secure storage by an employee authorized by the unit manager:

- Only to dispense the cannabis or Derivative Product;
- Only immediately before the cannabis is dispensed; and

- Only by a registered employee of company.

CASH MANAGEMENT

INTERNAL CONTROLS

The Dispensary Manager must ensure a system of internal controls is maintained for cash handling and accounting functions. Tight controls will remove opportunities for unauthorized access to cash. All cash handling will take place in view of a surveillance camera.

- Dual custody is required any time cash is transferred from the cash drawer to the automated cash vault and from the facility to the bank. Petty cash must be controlled by the Dispensary Manager and reconciled by the Controller. The petty cash account should be limited to $1,000. All receipts and vouchers must be accounted for and the drawer must always be in balance.
- Pin debit transactions must be reconciled weekly at a minimum by the Dispensary Manager.
- Two employees are required to open any cash safe or vault. Combinations should not be issued in totality to any one employee. To access stored cash, two employees are required to combine segments of the combination.
- The Dispensary Manager will ensure proper separation of duties, including the separation of the following activities:
- Making deposits and recording accounting entries.
- Approving petty cash transaction and replenishing the petty cash account.
- Approving expenses.

The Dispensary Manager and Security Officer are responsible for the security of all cash. The following cash security measures must be followed:

- All purchases must be paid with cash, credit card (as available to the company), or debit card. Payment by check is allowed only if approved by the Dispensary Manager.
- All employees are required to make a transfer to the automated cash vault maintaining their starting bank when their cash drawer reaches a balance of $2,000 or more.
- Cash must be in a secure and locked area with appropriate surveillance.

BANKING

Chestnut Hill Tree Farms, LLC has established a banking relationship for the Dispensing Organization's operations. The account will feature the ability to offer some forms of electronic transactions reducing the cash handling required for the operation. These transactions also improve patient security by reducing their need to carry cash.

First Green Bank was founded in 2009 by a team of experienced and successful local bankers after being given the last bank charter in the state of Florida. Headquartered in Mount Dora, Florida, FGB has branches throughout central Florida. FGB is a customer driven community bank providing personalized services, localized decision making and proven technology while promoting a positive environmental and social example to its community.

The management of First Green Bank has thoroughly analyzed the Florida medical cannabis law, the Department of Health rule 64.4, as well as the federal requirements and banking guidelines and have determined that the compliance system the bank has developed is able to provide banking services to dispensaries without the risks to the dispensary or to the Bank that might result from weak compliance management or deficient compliance systems.

Our First Green Bank comprehensive medical cannabis banking system is composed of several key elements which we have packaged together under a total banking solution:

A. A specialized Bank Secrecy Act compliance software application that is integrated with the seed-to-sale applications offered by BioTrackTHC and Adilas and the SmartSafe™ kiosk.
B. For the retail dispensary facility, a complete banking and currency management system that includes:
    1. A SmartSafe™ kiosk, which is able to process sales legally, using a PIN based debit card, currency and closed loop (similar to a gift card). We have negotiated an agreement with the provider of the SmartSafe™ system wherein each retail dispensary location will receive one kiosk system for a nominal price of $1 per year.
    2. Armored courier arrangements which will eliminate the dangers of accumulating currency at a retail establishment and avoid having to pay your operating costs in currency. We are currently in discussions with two armored courier companies who will pick up your currency and deposit it to your account in our bank.

The primary foundation set forth by the Federal and State governments in their decision to permit financial institutions to provide banking services to the marijuana industry is to eliminate the dangers of an all-cash business. Those dangers are not merely violence or robbery that could take place at your business or home, but also the danger that your business revenues could be diverted to other activities.

In permitting a financial institution to offer banking services to a Medical Marijuana Establishment ("MME"), and as a condition of being able to provide services to an MME, a financial institution is required to implement enhanced ongoing compliance programs meeting the requirements set forth in guidance released by the U.S. Department of Treasury (through its FinCEN Division), the U.S. Department of Justice and the Federal and State bank regulatory agencies. Additionally, each MME must comply with state and local laws and regulations and the state must have in place in place a robust and effective regulatory and enforcement structure.

The requirements imposed by the Federal government on a financial institution are composed of four primary components:

A. Mitigating the dangers of an all-cash business (FinCEN)
B. Preventing illegal activities such as sales to minors (Cole Memo key priorities)
C. Financial tracking and reporting (FinCEN)
D. Compliance testing (FinCEN)

A failure of a financial institution to implement an effective compliance system that incorporates all of the elements of the guidance may expose the financial institution to the risks of investigation and could result in civil penalties being imposed on the financial institution. Such a failure would also result in the termination of banking services provided to you, even if your business is operating in strict compliance with State law and regulations.

To comply with these requirements, a financial institution is required to perform compliance testing on operational and financial activities. The operational area relates to how an MME is operated (i.e. assure compliance with Cole Memo key Federal Priorities and State and local law and regulations). The financial area relates to tracking and reporting of financial activities (sales, cash activities, deposits, etc.).

In order to meet the requirements imposed on it by the Federal guidance, <u>and as a condition of providing banking services to an MME</u>, the Bank will perform operational compliance assessments and will require an MME to provide the Bank with financial information that is created in your "seed to sale", POS, kiosk and other accounting systems.

You likely are already reviewing various solutions for internal record keeping for inventories and movement, commonly referred to as "seed to sale" software. These systems are often incorporated into point of sale ("POS") systems that record sales and inventory transactions and kiosk systems that record sales and secure currency at a business location.

While it is not the Bank's role to require any specific vendor for any facet of your business, we must nevertheless advise you of the technical requirements for the Bank's compliance and integrated BSA solutions so as to help you and your selected vender be able to provide the information that we are required to obtain so that we are able to meet the record keeping obligations we have under the BSA that in turn allow us to provide banking services.

The following is a brief overview of the key components of the systems that must be in place.

Validation of a Customer's Legal Ability to Purchase

Dispensaries

There are various methods to validate the legal ability of a customer to purchase marijuana-related products. The first involves a computerized system that is connected to a database to be established by the State of Florida that verifies legal status and records sales of individuals holding a valid Florida Patient Identification card. Each sale is required to be linked to the legal identification and validation documentation so that at any time in the future, specific sales can be traced back to records detailing the transaction, thus verifying the legality of the sale under Florida law.

Other MME's

Typically, these other MME's sell products or services to dispensaries. These other MME's are required to maintain systems that record and maintain purchases and sales of all marijuana products, with the records reflecting the licensed other MME involved in the transaction.

Security and Controls over Currency

The Federal guidance has, as a primary focus, the elimination of the dangers of an all-cash business. This focus relates to the dangers of accumulating large amounts of cash, which make a MME, its owners, employees, customers and patients a natural target for robbery, violence or worse.
The Federal guidance speaks to the establishment of preventive controls and security over currency receipts, deposits and movement. The Department of Justice has noted problems with legally licensed MME's accumulating excessive amounts of currency which have been diverted and are subject to diversion for illegal uses, including organized crime and cartels.

The BSA requires financial institutions to implement monitoring and reporting systems that are designed to file reports on currency activities (Currency Transaction Reports, or "CTR's") and to implement monitoring systems that will detect currency activities which may be illegal.

Accordingly, a financial institution itself is required to take steps to assure that a customer has in place systems that will provide for both security and reporting of all currency activity.

In order to secure currency received from sales, each dispensary will be required to implement stringent access controls for currency received from a customer. The overriding goal is to assure that none of the currency is diverted and is instead deposited into the business' account and is traceable back to a legally approved sale.

Seed to Sale Computer Systems

A Seed to Sale computer system tracks a product from seed to sale in terms of growth, processing, transport, purchase and sale. This application contains data that is required to be reviewed and monitored by both the State of Florida as well as the Bank. Therefore, the data is required to be created and maintained for the State of Florida is used for the Bank's compliance function as well.

POS Systems

A POS system typically maintains in its programming data access to the listing of the usual products and prices, along with a linkage to a database of customers that have been validated to purchase medical marijuana products. The POS system may be a component of a "seed to sale" integrated software application.

Given that the MME is required to validate each sale as being to a customer who is registered (or licensed) and legally able to purchase a medical marijuana product, the POS System may contain a database for all registered customers in Florida, including individual patients and other businesses such as production facilities, laboratories and dispensaries. The database can be updated for manually validated customers.

The POS System must provide for a reporting of sales to the Bank so that we may have the sales data that we are required to review by the BSA. This consists of an electronic sales register which contains a link between the customer and the sales receipt.

Kiosk Systems

A kiosk is similar to a "reverse" ATM where currency goes into the kiosk instead of being dispensed out of an ATM. This system provides for high security of currency in a business location because employees do not have access to currency inside the kiosk. This also provides for a high degree of security from robbery as the currency cannot be accessed by an individual in an attempted robbery.

The general design and operating process for a kiosk is as follows:

A. Sales will be made in a multi-step process.

    1. After the legal status of the customer has been verified, the customer will enter a purchase request using the kiosk screen.

    2. The customer will then insert a pin based debit card, or currency into the kiosk for payment. If the closed loop payment option is selected, the customer will enter his name and/or account number.

    3. The kiosk will issue a purchase voucher to the customer and the sales associate will fill the order behind the counter.

    4. The customer will go to the sales counter and present the voucher and receive the purchased goods.

The kiosk will provide daily detailed sales reports and cash balance reports which will be provided to the Bank and to the armored courier.

The armored courier has dual security control over the currency, loads currency into the machine for purposes of making change and removes currency and delivers to a secure processing site. Note that in a kiosk environment, all currency is contained in locked canisters inside the device, similar to an ATM, which acts to eliminate currency shortages in the business and mitigate the risk of robbery.

The use of a qualified kiosk system is mandatory at each dispensary location. It is not mandatory for other types of MME businesses, as these other businesses are not expected to have a significant volume of cash transactions because they sell to and provide services to dispensaries which are assumed to qualify for bank accounts in accordance with this guidance to customers and will be paid by a dispensary using normal bank processes such as checks, wire transfers, ACH payments or internal bank transfers.

Third Party Systems – Integration

As to the Bank, we have created certain data sets for seed to sale, POS, kiosk and armored courier venders that are used in the Bank's BSA monitoring software so as to comply with the FinCEN requirements. These data sets are designed to use ordinary and routine data that these systems contain. These data sets can be produced by you directly, or they can be automatically generated by your software.

In an effort to reduce the work that you undertake, various seed to sale, POS and kiosk companies have been provided information and have already created the automatically generated data sets. We will be happy to provide you with information on those seed to sale companies that have already completed creating these data sets, and to provide you with these data sets, as this may impact your decision in selecting your seed to sale provider.

Electronic Payments

At the present time, none of the major credit card issuers in the United States have approved the use of credit cards in purchases or sales of marijuana. As a result, there are various forms of electronic payment systems being established or in use today to meet this need. Some of those electronic payment systems are legal and acceptable and some are not.

Acceptable electronic payment systems include:

A. Pin verified bank debit card transactions.
   To the extent that the merchant processing account is legally established and disclosed for the processing of payments for the purchase of marijuana, a bank debit card is a legal and valid form of payment.

B. Closed loop accounts.
   Closed loop accounts are established whereby funds that are loaded onto the accounts in the name of a specific customer that are restricted for purchases within the MME. A well-known example of a closed loop payment system is a Starbucks card that is usable only at a Starbucks retail location. The closed loop accounts can only be issued to individuals whose identity has been verified.

Non-approved electronic payments systems include**:**

A. Open loop network branded stored value cards.
   An open loop network branded stored value card is one having the Visa or MasterCard logo on it where funds can be loaded to the card and used in any location, such as a grocery store or a gasoline station.

   The unverified source of such funds may then be diverted to any purpose at any place or time and as such, provides

a recognized potential conversion for money laundering which possibility must be avoided.

The activity of creating stored value cards falls within the registration requirements of 31 U.S. Code §5330 - Registration of Money Transmitting Businesses.

The acceptance of cash at a dispensary to be loaded onto a stored value card exposes the MME business and the Bank to charges of money laundering activities under 18 U.S.C. §§ 1956 and 1957. It is emphasized that under the February 14, 2014 Cole Memo II, guidance is issued for banking services coupled with a warning that:

> *Financial transactions involving proceeds generated by marijuana-related conduct can form the basis for prosecution under……..the unlicensed money transmitter statute (18 U.S.C. §1960), and the BSA. Sections 1956 and 1957 of Title 18 make it a criminal offense to engage in certain financial and monetary transactions with the proceeds of a "specified unlawful activity," including proceeds from marijuana-related violations of the CSA.*

B. ATM's and "Cashless ATM's".

An ATM is a device that permits an individual to withdraw currency. In a dispensary setting, the purpose of the withdrawal is to obtain currency for the purchase of a marijuana product sold by the retail store, with the amount of the withdrawal being equal to or different from the amount of the actual purchase. An ATM device is enabled to charge the withdrawal from a bank account or a credit card account.

A cashless ATM is a terminal based system that allows a business to charge a bank account or a credit card effectively as a withdrawal or cash advance.

These systems are problematic in operation, as often times, the devices are set up so as to mask the name of the business, or to mask the type of transaction (i.e. coding the transaction as a cash advance instead of a purchase), or to mask the nature of the purchase (purchase of marijuana). The use of such tactics and devices is prohibited by law and the MasterCard and Visa Networks Terms of Use agreements.

These activities resulted in over 1,400 such businesses having their ATM devices disabled virtually overnight in late 2014 with the sponsoring bank (MetaBank, one of the largest providers of ATM's in the country) advising the subcontracted ATM providers by email that ATM machines in marijuana shops violated federal banking rules. Although the sponsoring bank did not state which banking regulations were referred to, we believe that the sponsoring bank was referring to 18 U.S.C. §§ 1956 and 1957, noted above.

There is an ongoing investigative effort by the Federal government relating to "Cashless ATM's at this time and our best advice for dispensaries is to avoid them altogether.

C. Mobile Wallets.

A mobile wallet operates similarly to an open loop stored value device in that it is used to facilitate the movement of funds from a regular bank account or a credit card account to a stored value device with the funds then used to pay for marijuana purchases.

Mobile Wallets have a number of serious issues for an MRB and its bank, including:

1. Using its "zero balance" feature, a Mobile Wallet transfers funds directly from a credit card account and then uses these funds to pay for marijuana purchase. Essentially, the credit card is used to make the purchase, which may be a violation of the MasterCard and Visa Networks terms of use agreements, regardless of the two-step process that is employed.

2. The credit card cash advance fees associated with a Mobile Wallet device are not disclosed by the MRB to the consumer. Often, these fees amount to $25.00 to $30.00, resulting in a customer paying fees that can exceed 30% of the purchase amount.

3. The structure of the transaction appears to have the same potential risk to the business and a bank under 18 U.S.C. §§ 1956 and 1957, as discussed above in relationship to ATM's.

[redacted]

[redacted]

[redacted]

Service Provider Data Reporting Requirements

The provision of these electronic data sets from the Seed to Sale, Kiosk, Electronic Payment Systems, POS systems, Cash Vault, and Armored Courier (collectively, the "Service Providers") is mandatory as a condition of our being able to provide banking services that are efficient and at the lowest cost to you.

Given the number of Service Providers that will be preparing the required data sets, the use of a third party to aggregate all data sets into a single large daily file as opposed to having the Bank deal with hundreds of daily files will serve to significantly lessen the Bank's costs and your costs.

We are in communication with, and are only aware of one such company that has aggregated and connected various Service Providers listed above into one service offering which appears to be able to provide all the various reports in a compatible and complete format to the Bank to adequately monitor the flow-through of product and payments. This third party is engaged in a collaborative project with Seed to Sale, Kiosk and POS companies and we expect that this project will be successfully completed prior to the commencement of your business.

The company also provides for a turnkey and no cost solution for dispensaries using its kiosk and processing systems. There are no Bank costs or pass through costs to an MME for this aggregation system. We will provide you with the contact information for that company at your request.

Accordingly, as you start the process of evaluating these systems (or others), please keep in touch with us, inasmuch as your selection of these systems may be the difference in being able to obtain efficient and low cost banking services from us based upon our ability to efficiently discharge our duties under the BSA and Federal Guidelines.

Payroll Services - The Classic "Catch 22"

One of the very serious banking problems faced by MME's is processing of payroll. National firms have refused to provide full payroll and tax reporting services out of concern for legal exposure or reputation risk. Some firms will "crunch the numbers", but employees still must be paid in currency and withheld taxes must be paid in currency to the state and local governments and to the Internal Revenue Service.

This disconnect creates serious impediments for your business operations and for the Bank. As an example, your Federal Tax Withholdings are required to be paid electronically to the Internal Revenue Service. A failure to pay electronically subjects you to a fine of 10% of the required deposit amount. If an MME doesn't have a bank account, it could be fined every time it follows the law and pays over the withheld taxes. This condition often results in late payments (or in rare

cases) no payments, which are in violation of law and this one violation could act to prohibit a bank from providing banking services.

For the reasons mentioned above, we recommend the use of a qualified third party professional employment organization (PEO) for all MME businesses. The alternative as to payroll processing could include the use of a management company that provides for these services and pays employees under its own name with its operations structured similarly to a PEO.

Under this approach, all employees will be paid electronically, either by ACH credit to an employee's bank account or a credit posting to a VISA stored value card. This eliminates the dangers associated with paying employees and the I.R.S. in currency as all payroll and tax payments are completed timely and electronically.

Of secondary benefit is that many PEO's and management companies also offer a full complement of group benefit plans, such as health, life, disability, dental, etc. - in addition to general insurance policies such as workers comp, liability, Employer Practices, etc.

We have received information on PEO's that would provide adequate services for your business. If you would like to receive materials on or a referral to these service providers, please let us know.

Banking Relationships

In order for the Bank to comply with monitoring of an MME's aggregate deposit activity as required by the BSA, **ALL** of an MME's bank accounts must be maintained by our Bank and **ALL** revenues from the business must be deposited into our Bank.

Periodic Compliance Assessments and Reviews by Bank

We will conduct periodic limited compliance assessments with the above. The Report will be provided to your Designated Representative as a courtesy and to facilitate the remediation of any compliance issues. Your Designated Representative is typically the Managing Member of the LLC, the President of the company or another senior-most member of management.

These compliance assessment reports are designed to meet the Bank's compliance standards and obligations, with appropriate due diligence and review as directed under Federal, State and local law for compliance purposes. These compliance assessments do not replace the State compliance inspections, as our assessments are limited in scope to those areas of State law that directly impact the Bank's ability to provide services.

As such, these reports can be useful in protecting your business from more extensive and disruptive investigations from other governmental entities, such as the DEA or the Justice Department. Secondly, as noted above, an ongoing written assessment of compliance is a requirement of the BSA imposed on the Bank.

A material and continuing failure to maintain these standards may result in the discontinuation of banking services.

MME Deposit Account Initial Requirements

Pursuant to our compliance obligations under the BSA, we are required to complete initial Due Diligence which requires

that we receive and review the following:

A. A copy of the full application filed with the State of Florida.

B. A copy of the Provisional or Permanent License issued by the State of Florida.

C. A copy of local government permits, such as the business permit and the conditional use permit.

D. A copy of your sales tax permit.

E. The name, address and Taxpayer Identification Number for each Designated Individual.

To open an account, the MME will also need to submit the normal documents as for any business account. A complete new account kit will be sent to you.

A Customer Service Agreement is also required to be completed. This agreement spells out the costs and fees for the Bank's compliance work and sets forth the information that an MME needs to provide the Bank on an ongoing basis. This will be provided to you with the new account kit.

Costs and Fees

It is our goal to implement a compliance system that will meet the expectations of the Federal and State agencies, including the bank regulatory agencies. In this manner, our services to you will not face the danger of being suddenly terminated owing to our failure to implement a satisfactory compliance system. This has occurred with some regularity in other states with financial institutions that have not put forth the maximum effort. These systems are not inexpensive. To cover these added costs, a monthly BSA service fee will be charged at a rate that we believe will be appropriate as set forth in the Customer Service Agreement.

Finally, inasmuch as a significant portion of our costs are fixed (as an example, a dedicated BSA audit staff), it is in both of our interests that we provide banking services to as many of the qualified, approved and compliant MME's as possible so that we can spread the cost out to as wide a group as possible so that the costs to any one business may be minimized.

If you have any questions, please do not hesitate to contact me.

Sincerely,

Kenneth E. LaRoe
Chief Executive Officer and President

World Headquarters
18251 U.S. Highway 441
Mount Dora, FL 32757
352.483.9100

A. A specialized Bank Secrecy Act compliance software application that is integrated with the seed-to-sale applications offered by BioTrackTHC and Adilas and the *SmartSafe*™ kiosk.

B. For the retail dispensary facility, a complete banking and currency management system that includes:

1. A *SmartSafe*™ kiosk, which is able to process sales legally, using a PIN based debit card, currency and closed loop (similar to a gift card). We have negotiated an agreement with the provider of the *SmartSafe*™ system wherein each retail dispensary location will receive one kiosk system for a nominal price of $1 per year.

2. Armored courier arrangements which will eliminate the dangers of accumulating currency at a retail establishment and avoid having to pay your operating costs in currency. We are currently in discussions with two armored courier companies who will pick up your currency and deposit it to your account in our bank.

We are in the process of finalizing all systems reviews and implementation procedures within the next 30 days in anticipation of your nursery receiving a dispensary license and initiating banking activities later this year and sales of product into 2016. In the interim, we are able to accept your business as a bank customer and to hold your capital funds pending the selection of the successful applicants by the State of Florida.

If you are interested in exploring how this full service banking solution can address your banking, cash management and merchant account issues in the Florida medical cannabis industry at a reasonable cost, we would like to talk with to discuss how First Green Bank can be your key financial partner in this new and exciting industry. We believe this banking solution can add an important and unique component to your Department of Health dispensary license application. This is as important to us as it is to you. If you have an interest in this innovative banking service for the Florida medical cannabis industry, please let us know so we can follow up with more details.

If you have any questions, please do not hesitate to contact me.

Sincerely,

Kenneth E. LaRoe
Chief Executive Officer and President

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Part 3.C.4.g. Policies and procedures for recordkeeping

BIOTRACKTHC

BioTrackTHC enables the business to collect, store, and retrieve all data and activity. All inventory records, patient records, recall reports, sales/transaction records, product disposal records, and all scanned documents can be accessed at any time (real time), either in-system or through the report creation tool. Though system actions can be adjusted or voided, at no time is any data ever fully deleted as BioTrackTHC maintains a log of every action, including adjustments and voids, so that the entire history of the system may be reconstructed. The availability and report ability of the system data enables the said entity to produce any information necessary for an inspection.

RECORDKEEPING

The company's recordkeeping policies and procedures ensure the maintenance of true, complete, and current records that will be available for inspection by the OCU upon request. The Dispensary Manager is responsible for recordkeeping at the dispensing facility level.

Provisions are established to ensure confidentiality and prevent the disclosure of information about qualified patients, designated legal representatives, and employees. All patient records will be handled in a manner similar to protected medical records. Measures for addressing and reporting any loss or unauthorized alteration of records related to Derivative Products are detailed in the recordkeeping policies and procedures.

CERTIFIED PATIENT AND DESIGNATED LEGAL REPRESENTATIVE RECORDS

Information held by the company about qualified patients, designated legal representatives, and employees is confidential and will not be disclosed without the written consent of the individual to whom the information applies, or as required under law or pursuant to an order from a court of competent jurisdiction. However, the OCU may access this information to carry out official duties.

The dispensing facility will maintain a transparent and fully accountable set of dispensing facility-related records for internal and external audits, as well as review by the OCU. All physical documents, such as patient files, transaction records, inventory records, security records, audit records, business records, and financial records will be stored electronically in redundant and geographically dispersed Class 5 data centers to provide the maximum level of security and compliance with all state and federal document storage and confidentiality rules, including HIPAA regulations. This method of storage ensures that all records are adequately protected from loss, damage, or unauthorized use.

SALES RECORDS

The Dispensary Manager, in coordination with the Medical Director, is responsible for true and accurate records entered and maintained in the BioTrackTHC system. All sales records must record the price of all products sold and comply with all recordkeeping policies and procedures, as well as OCU regulations.

The company will allow the OCU or the OCU's authorized representative to examine records that formed the basis for pricing, including books, records, documents, and other types of factual information that inform an adequate evaluation of the cost of goods sold.

Sales records will indicate the name of the certified patient or designated legal representative to whom Derivative Product(s) has been dispensed. A record of all approved Derivative Products that have been dispensed must be filed electronically with the OCU registry, utilizing a transmission format acceptable to the OCU, immediately after the Derivative Product was dispensed to the certified patient or designated legal representative. The information filed with the OCU for each approved Derivative Product dispensed will include, but is not limited to:

- A serial number that will be generated by the dispensing facility for each approved Derivative Product dispensed to the certified patient or designated legal representative;
- An identification number that will be populated by a number provided by the OCU, to identify the company's dispensing facility;
- The patient name, date of birth, and gender;
- The patient address, including street, city, state, and zip code;
- The patient's phone number and email address
- The patient's registry identification card number;
- Indication for which medical cannabis has been prescribed
- If applicable, designated legal representative's name and registry identification card number;
- The date the approved Derivative Product was filled by the dispensing facility;
- The metric quantity for the approved Derivative Product;
- The Derivative Product drug code number that will be populated by a number provided by the OCU, to represent the approved Derivative Product brand that was dispensed to the certified patient or designated legal representative, as applicable;
- The number of days' supply dispensed;
- The registered physician's name and Drug Enforcement Administration number;
- The date the written certification was issued by the registered physician; and
- The payment method.

When applicable, the company will file a zero report with the OCU, in a format acceptable to the OCU. A zero report confirms that no approved Derivative Product was dispensed by the company during the relevant period of time.

Reporting of Records Incidents

Any loss or unauthorized alteration of records at the dispensing facility related to Derivative Products, qualified patients, designated legal representatives, or employees will be reported to the Security Director immediately. The Security Director will report any such incident to the Medical Director, the OCU, and law enforcement as necessary.Point of Sale System

All inventory and sales will be tracked and reported directly into the BioTrackTHC traceability software platform. This will enable the company to maintain sufficient controls over sales and to prevent unlawful sales or sales over established purchase limits.

MAINTAINING A PATIENT-SPECIFIC LOG

When dispensing Derivative Products, employees will provide a patient-specific log of Derivative Products (noting the brand, administration form, and dosage, and dates dispensed and any return of product) to the patient, the patient's designated legal representative, if applicable, or the patient's practitioner upon request.

RECEIPTS

The employee conducting the sale will provide to the certified patient or designated legal representative a receipt, which will state: the name, address, and registry identification number for the company; the name and registry identification number of the certified patient and the designated legal representative (if any); the date and time of the sale; any recommendation or limitation by the practitioner as to the form or forms of medical cannabis or dosage for the certified patient; and the forms and the quantities of Derivative Product dispensed. The company will retain a copy of the registry identification card and the receipt for five years.

TAXES AND SALES ACCOUNTING

All sales transactions will be subject to applicable sales tax rates. The proper sales tax rates will be programmed into each point of sale system to ensure sales tax is being collected. It is the responsibility of the Dispensary Manager to ensure the proper collection of sales tax on all taxable products, sold in the dispensing facility for the jurisdiction.

Part 3.C.4.h. Methods of screening and monitoring employees

EMPLOYEE SCREENING AND MONITORING

It is critical for the security of the company that only the most qualified, credible, and talented people are hired to help avoid workplace theft, fraud, or violence. It's equally important for the company to conduct background screening on the contingent workers, including cleaning crews, facilities maintenance workers, auditors, and other contractors who have access to the company's property or represent the company. Knowing the background of these workers is required to protect the integrity of the company, as well as the safety of patients. Therefore, this workforce needs to be screened with the same due diligence as any other employee.

To help attract, hire, land, and retain the best employees the company has developed employment screening and monitoring processes to create a candidate experience that benefits potential employees and reduce company risk by utilizing a fast, scalable, and compliant background screening solution.

PRE-SCREENING POTENTIAL CANDIDATES

The Human Resources Manager will pre-screen candidates by stating clearly to potential applicants what items and prerequisites will be needed to properly qualify the employment application. This will streamline the company's application process by having applicants review the information and then determine whether or not they meet the qualifications. This is part of the proactive pre-screening process that ensures applicants who submit their information will pre-qualify based on the specific information needed later in the process.

Chestnut Hill Tree Farm will integrate instant and automated employment screening products into the hiring process.

- Instant searches will be used to efficiently move forward in the hiring process by quickly confirming or validating basic information such as a Social Security number or name and address history.
- Automated searches will provide electronic delivery of process updates and results, eliminating time delays often associated with manual follow-up on important screening components such as employment or education verifications.

COMPLIANCE

The Human Resources Manager will ensure compliance with local, state and federal laws regarding the hiring and employment screening processes. The most prominent legislation the company will abide by is the Fair Credit Reporting Act ("FCRA"). The company will consult legal counsel regarding local state and federal laws, and related employment law matters.

REDUCING RISK

An efficient, thorough employment screening process can, above all else, help reduce the company's overall workplace risk. Identifying risk early, prior to hiring an employee, protects the organization from risk related to:

- Physical Safety
- Financial Security
- Organizational Image or Reputation
- Legal Compliance

EMPLOYMENT SCREENING PROCESS

Criminal History

The company will screen candidates for criminal records to promote a safe, secure workplace by reducing employment-related risk linked to a criminal history. The following searches may be performed depending upon the type of position the candidate is seeking.

- Member-Contributory Theft Information Database – the company will use a member based program where companies share employee theft and shoplifting information to identify applicants with a history of internal theft. The database is built from member contributions and be available exclusively to member organizations. Member contributions are typically proprietary records and not found through traditional public record sources.
- National Criminal File Search – Some vendors can offer access to a nationwide database of criminal records gathered from across all 50 states. A variety of sources are utilized including Sex Offender Registries, state and county criminal courts and state-level departments of corrections. This search can provide instant results depending on the provider.
- Felony and Misdemeanor Search – This county courthouse search includes a search of all felonies and misdemeanors on all indexes available at the main county seat court location.
- Motor Vehicle Report – A Motor Vehicle Report ("MVR") reveals the status of an applicant's driver's license and any violation history. This search should be conducted on all candidates who will have driving responsibility for a company, including those who will not only drive a company vehicle but will also drive a personal vehicle on company time or for company purposes.

Verification and Qualification

The Human Resources Manager will utilize the following solutions depending on the level of security required for the position.

- Social Security Number Verification ("SSNV") – This search matches the input information against millions of consumer header credit files contained in the databases of nationwide credit reporting agencies. The SSNV returns other names and addresses associated with the identifying information used to request the report.
- Credit Check – This search matches the candidate's information to information held by the Credit Bureaus, and returns the candidate's credit report.
- Employment Verification and/or Education Verification – These two products are used to verify the information provided by the candidate.
- Employment Eligibility – An employment eligibility verification service will be used to streamline the Form I-9 process. The company will participate in the E-Verify program to confirm every new hire's employment eligibility by sending the information used to complete the I-9 through the Social Security Administration ("SSA") and Department of Homeland Security ("DHS") databases.

Occupational and Biometric Services

Chestnut Hill Tree Farm will utilize a drug testing service provider who will track results, provide reports, and ensure the company stays in compliance with the law. The service provider will:

- Assist the company in developing or updating drug testing policies
- Coordinate and store your Driver Qualification Verification files
- Meet your immunization and medical exam requirements including receiving the exam results

A basic DOT Five Panel Drug Test (urine conventional) will be used. The following drugs will be tested from the applicant's urine sample:

- Amphetamines (Amphetamine, and Methamphetamine)
- Benzoylecgonine (Cocaine Metabolite)
- Cannabinoids (Marijuana Metabolite, and THC-COOH)
- Opiates (Codeine, and Morphine)

- Phencyclidine (“PCP”)

Adjudication and Alerts

Chestnut Hill Tree Farm will provide a criminal records adjudication policy as part of the screening process. FCRA-mandated Adverse Action letters for candidates that fail to meet specific screening criteria set forth by the organization will be delivered to candidates.

MONITORING EMPLOYEES

A monthly compliance exception report is completed for the employment screening process. The report informs the Human Resources Manager which candidates have completed various parts of the screening process and which have not. The report also updates the company to which components are missing from a candidate’s employment screening process.

The Human Resources Manager will cause all required criminal and drug screens to be updated every two years. Employees are required to notify the company whenever they have any type of encounter with law enforcement. The Human Resources Manager will determine if a Level 2 background screening should be performed upon the employee’s notice. A post-accident drug screening may be performed at the Human Resources Manager’s discretion or if required for worker’s compensation purposes.

Video monitoring of employees occurs in the normal course of operations. Additional footage may be reviewed if any employee is suspected of theft or diversion. The company will notify law enforcement of any employee determined to have stolen any medical cannabis whether plant or product form. Employee performance is monitored by their immediate supervisor and documented in accordance with the company’s staffing policies.

Each unit Director is ultimately responsible for all staff in their respective unit. Each Director will be familiar with the layout and technical specifications of the facility, all equipment utilized, and able to perform and train others to perform all activities necessary in the facility. The company is dedicated to training all employees to excel in their position through on-the-job training and classroom learning opportunities. Third-party training will be provided when determined to be beneficial by the Director and may include training on personnel safety, food safety, GMP, good agricultural practice, and other management practices.

All employees will receive employee manuals prior to employment. The employee manual provides in-depth training for cultivation policies and procedures. Each unit Director is responsible for ensuring that each employee has received, read, and acknowledged their understanding of the material covered in the employee manual. All manufacturing employees will be trained by their unit Director and will be required to continually demonstrate a working knowledge of training materials as a condition of employment. All employees are required to have a working knowledge of all production standards established by their Directors for medical Derivative Production.

Any changes to SOPs will be approved by the OCU and communicated to all manufacturing facility employees. An acknowledgement of understanding will be documented for each employee. Training on SOP changes will be provided as necessary. The company is dedicated to training all employees to excel in their position. It is company policy to ensure that all employees receive professional and appropriate training on compliance with state law, the therapeutic use of medical cannabis, safety, security, incident management, and diversion and theft prevention. No employee may work on-site prior to receiving orientation training or when any required critical training is past due.

BIOTRACKTHC MONITORING

BioTrackTHC records every transaction with an employee PIN or biometric fingerprint scan. Furthermore, the system allows for employee-specific customizable permissions allowing for several layers of added security. This ensures that only specific employees are granted access to permissions such as receiving new inventory, product processing or plant propagation. In reference to internal diversion, the vertical hardware integration with the scales, scanners, barcodes and labels will streamline all processes and diminish the chances of human error or manipulation. Inventory audit logs are also available in the event a discrepancy arises anywhere in the purchase order, transportation or vendor intake process. These reports can be filtered by employee, date, vendor, purchase order, product, or plant for complete transparency and accountability. In addition there is an inventory forensics log that will show every inventory action performed. It is so detailed in fact that unless it is filtered by action, product or date range the information becomes too overwhelming for the average person. When every gram of product is accounted for, all invested parties can rest easy.

Inventory Forensics Report

Name	Inventory id	Location	Previous quantity	New quantity
AK-47	0129 3807 1592 7867			
		"Grow" Dispensary	626.00	626.00
		"Grow" Dispensary	626.00	626.00
AK-47	0785 1262 5028 8317			
		"Grow" Dispensary	1051.00	1037.00
		"Grow" Dispensary	1051.00	1037.00
Acapulco Gold	0807 4387 4280 7830			
		"Grow" Dispensary	1620.00	1620.00
		"Grow" Dispensary	1620.00	1620.00
Bananna Kush	0970 2042 5113 2514			
		"Grow" Dispensary	112.00	112.00
		"Grow" Dispensary	112.00	112.00

Part 3.C.4.i. Personnel qualifications and experience with chain of custody or other tracking mechanisms

BIOTRACKTHC

BioTrackTHC has a biometric chain of custody module that logs every action in real time and the user who performed that action. BioTrackTHC has the ability to integrate with scales to deter employee theft and human error. Every action is time stamped which can be cross referenced with security cameras. All of these functions prevent diversion, abuse, and illegal or unauthorized conduct relating to medical Derivative Products.

PERSONNEL

In addition to the specialized cannabis tracking system, BioTrackTHC, the company has a large pool of expertise available for tracking purposes. These experts include:

BRADY BLAKE - CONSULTANT

As a quality control manager at Colorado Alternative Medicine, Blake gained extensive experience implementing and operating Colorado's State mandated tracking software system, Marijuana Inventory Tracking System, which efficiently tracks each crop from seed-to-sale. He believes his experience using the company's prior point-of-sale inventory software program, MMJ Freeway, provided a smooth transition to the use of a more advanced and efficient technology base. In 2013, Blake was promoted to a senior management position. He became responsible for the care and tracking of over 4,000 plants and approximately twenty new employees in a grow facility housing 240,000 watts of flower production.

CODI COLEMAN – CULTIVATION DIRECTOR

As a leader in quality assurance and Derivative Production, Coleman begins his cultivation process by tracking and labeling each product from the moment the crop is propagated. He applies a seed-to-sale system to keep track of each plant he harvests. His methods involve full compliance to all laws and regulations.

JILL LAMOUREUX – ADVISOR

Jill Lamoureux has been a cannabis industry frontrunner in the State of Colorado since 2008, when she and her husband created one of the Colorado's most respected multi-location dispensing operations. Their branches of business consisted of four retail stores, three cultivation operations, and one cannabis kitchen. As a former dispensary and cultivation owner and operator, she brings first-hand experience with tracking all cannabis plants grown in a particular harvest. In 2010, Lamoureux worked with the State of Colorado's Medical Marijuana Enforcement Division (MMED) to develop the first statewide medical cannabis regulations regarding tracking, transparency reporting, and compliance. These regulations required every cannabis-producing plant to be tracked by the MMED through each stage of its life, from cultivation to point of sale. Since 2013, Lamoureux has served as a subject matter expert consulting to the BOTEC Analysis Corporation in cannabis regulation and policy. Recently, she provided aid to the BOTEC team advising Washing State on rule-making issues for recreational cannabis operation, including regulations concerning tracking cannabis crops from seed

Part 3.C.4.j. Personnel reserved solely for inventory control purposes

The Inventory Manager will report directly to the Chief Operating Officer. The position works with the Chief Financial Officer to oversee all inventory operations in the company. The Inventory Manager role will be filled by R. Dunstan Wallace II. Wallace shall assist the company in all inventory control processes. Wallace holds a Bachelor's Degree from the University of Florida where he graduated in accounting. He began working with Chestnut Hill Tree Farm in 2011, building complete websites for consumer retail and marketing. Additionally, he has extensive experience developing Quick Books accounting software for companies, and currently serves as a staff accountant at the University of Florida.

Part 3.C.4.k. Personnel reserved solely for security purposes

John Powell will serve as the company's Security Director. Powell is an experienced law enforcement and public safety professional with a solid academic foundation who has progressively served at all levels with increasing responsibility and accountability gaining real life experience and professional training. This experience enables effective operations in planning, asset allocation, diversity/gender awareness, personnel management and negotiations, strategic planning, tactical response, organizing, recruiting, budgeting, succession planning and relationship building. As a former Maricopa County Protective Services Department Director and Director of Florida's Division of Alcoholic Beverages and Tobacco department, Powell brings a great deal of anti-diversion, loss prevention, and asset protection expertise to the dispensing organization. His vast and wide experience in local, federal government, school, and information technology security will be invaluable to the company and its stakeholders.

QUALITY ASSURANCE

The prevention of recall events begins with a strong Quality Control and Assurance program. The Dispensary Manager, in coordination with the Medical Director and the Quality Assurance Officer, will ensure that the quality assurance policies and procedures are followed at all times. The company's quality assurance policies and procedures include the elimination of the potential for dispensing errors by mandating positive central facility confirmation of each purchase before providing it to the certified patient or designated legal representative. Prevention of recall events is the company's first priority. A robust Quality Control and Assurance program will reduce the chances of a recall event.

PACKAGING AND LABELING REQUIREMENTS

All Derivative Product packaging will have bar coding for its subsequent scanning at the dispensing facility. The required bar code information will include the product brand (strength), dosage form, lot number, expiration dating, and any other information required to confirm the product is in accordance with the patient's current practitioner certification.

PATIENT DISPENSING RECORDS

Dispensing facility requirements include maintaining individual certified patient-specific dispensing records for each Derivative Product dispensed, applicable lot number(s), dates dispensed, and product expiry dating. These dispensing records will be monitored electronically for compliance with all company policies. Dispensing facility employees may not dispense any Derivative Product to a certified patient or designated legal representative without first electronically obtaining and documenting this confirmation from the OCU registry.

MEDICAL CANNABIS PRODUCT QUALITY

Dispensary Manager Responsibilities

The Dispensary Manager has authority to and responsibility for approving or rejecting all components, product containers, closures, packaging materials, and labeling of Derivative Products; and approving or rejecting all procedures or specifications that may impact the identity, strength, quality, and purity of the Derivative Products used in the dispensary.

Employee Responsibilities

All dispensing facility employees are responsible for maintaining the identity, strength, quality, and purity of the Derivative Products dispensed. The Dispensary Manager will ensure that all quality assurance processes required are sufficient and documented, as well as that all employees are trained to properly execute quality assurance processes.

DISPOSAL OF IMPROPERLY STORED MEDICAL MARIJUANA PRODUCTS

The Dispensary Manager will ensure that Derivative Products that have in the unlikely event been subjected to improper storage conditions, including, without limitation, extremes in temperature, humidity, smoke, fumes, pressure, age, or radiation due to natural disasters, fires, accidents or equipment failures, are not salvaged and are not dispensed and are disposed of in accordance with the company's disposal policies and procedures.

SALVAGED PRODUCT REQUIREMENTS

If the Dispensary Director or Manager in coordination with the Quality Assurance Officer believes that Derivative Products have not been damaged due to improper storage conditions, they may authorize salvaging operations only if upon review, there is:

- Evidence from laboratory tests and assays that the Derivative Products meet all applicable standards of identity, strength, quality, and purity; and
- Evidence from inspection of the premises that the Derivative Products and associated packaging were not subjected to improper storage conditions as a result of the disaster or accident, if any.

The Dispensary Manager will maintain records including the name, lot number and disposition for Derivative Products salvaged.

PRODUCT COMPLAINTS, ADVERSE EVENTS, WITHDRAWAL, AND RECALLS

COMPLAINT HANDLING

All employees are responsible for documenting any complaint received from another employee, a certified patient or designated legal representative, or any other party in the dispensary's complaint log. An employee may receive a complaint in person, by phone, or email. Any employee receiving a complaint must notify the Dispensary Manager immediately. All employees will be trained by the Dispensary Manager to handle complaints including verbal de-escalation techniques, investigative questioning, and notification of appropriate parties.

COMPLAINT CLASSIFICATION

All complaints must be categorized by the Dispensary Manager as a dispensing error, product performance complaint, quality complaint, adverse event report, or other complaint. Other complaints may include, but are not limited to neighborhood-related issues, service-related issues, employee-related issues, or other operational related issues.

ADVERSE EVENTS

Chestnut Hill Tree Farms, LLC intends to collect reliable patient data from the dispensary. Patient feedback will be critical to the company's future R&D plans. The Chief Executive Officer has elected to adopt the US Dept. of Health and Human Services' Guidance on Reviewing and Reporting Unanticipated Problems Involving Risks to Subjects or Others and Adverse Events[2]. The comprehensive standard is used for protection of human subjects in research. Prior to the sale of any Derivative Product, the Chief Operating Officer, Medical Director, and Quality Assurance Officer will implement policies and procedures and develop reporting mechanisms for adverse event reporting. The team will also train managers and dispensary staff on receiving reports. In the event the adverse event was expected, i.e. dizziness, drowsiness) the complaint should not be classified as an adverse event.

DISPENSING ERRORS AND RECALLS

The Dispensary Manager, in coordination with the Medical Director and the Quality Assurance Officer will handle any errors and/or recall or withdrawal operations due to affected products that may occur within dispensing facility. The Dispensary Manager, in coordination with the Medical Director and the Outreach Manager, is responsible for

[2] http://www.hhs.gov/ohrp/policy/advevntguid.html#Q2

Part 3.C.4.l. Plans for the recall of any Derivative Products that have a reasonable probability of causing adverse health consequences based on a testing result, bad patient reaction, or other reason

communicating to all qualified patients and designated legal representatives, employees, the OCU, and the company's management about any recalls or withdrawals of particular Derivative Products or related products.

OTHER COMPLAINT RESOLUTION

The Dispensary Manager will respond to any complainant relating to any issue other than product-related issues within twenty-four (24) hours. It is the company's policy to make a good faith effort to resolve any complaint, whether legitimate or frivolous, whenever possible.

INVESTIGATION OF A COMPLAINT

The Dispensary Manager, in coordination with the Medical Director and the Quality Assurance Officer, will ensure all policies and procedures for returns, complaints, adverse events, and recalls are being followed. Once notification of a withdrawal, recall, dispensing error, adverse event report, or patient complaint has been received, the necessary, accurate, and detailed documentation and product tracking will begin immediately. The process includes:

- Gathering information from the patient or legal representative, supplier, or regulator about the nature of the product complaint.
- Assembling upon the direction of the Medical Director the personnel or experts needed to conduct a product complaint investigation.
- Conducting a thorough investigation into the problem with the affected product.
- Determining the nature and potential causes of the problem.
- Determining any other product(s) that may potentially be affected.
- Entering all information into a complaint log.
- Determining the course of action using these criteria:
    1. Product Recall: Safety or health risk due to physical, chemical, biological, or immunological. Proceed to the company's recall policies and procedures.
    2. Product Withdrawal: a quality-related issue with the affected product(s).
    3. No Corrective Actions: an isolated incident with the affected product(s).

Part 3.C.4.m. Waste disposal plan

WASTE DISPOSAL PROCEDURES

SOURCES

Chestnut Hill Tree Farm has a comprehensive system for systematically collecting and properly destroying all materials containing cannabis. The final material disposal will render both finished product and precursor materials completely unrecoverable beyond reclamation. Routine disposal procedures will include company employees to securely transport all materials designated for destruction to the cultivation facility for compost or medical waste disposal. Controlled waste materials for destruction may originate from several sources:

- Cannabis stems or other unusable plant materials generated at the manufacturing site are weighed, labeled and stored in a limited access area until they can be properly destroyed.
- All cannabinoid containing extracts, concentrates, in-process materials and bulk product that cannot be further processed into approvable packaged product are labeled and held under quarantine in a secure storage area until they can be properly destroyed.
- Packaged product determined to not meet the minimum safety standards and specifications for brand consistency or otherwise rejected by Quality Assurance are held under quarantine in a secure storage area separate from any released products until they can be properly destroyed.
- Packaged medical Derivative Products at a dispensing facility that become damaged, short dated or were returned by a customer are securely stored at the dispensing facility until they can be properly transported to the manufacturing site and securely stored until they can be properly destroyed.
- Any products that were subjected to improper storage conditions including but not limited to extremes in temperature, water damage or smoke due to natural disasters, fires or equipment failures are held under quarantine and securely stored until they can be properly destroyed.

CHAIN OF CUSTODY

A rigorous chain of custody shall be maintained to ensure that medical Derivative Products that have failed laboratory testing are not released for distribution in compliance with all company policies and procedures. All products waiting for laboratory analysis are held in quarantine. Upon notice of a failed batch, the Quality Assurance Officer will oversee the disposal of the batch in the presence of one witness and under the surveillance of security cameras.

PRODUCT SECURITY AND RECORDKEEPING

Quarantined batches will be held in storage with full camera coverage until the Quality Assurance Officer removes the batch for disposal. All batches will be properly labeled for disposal and entered into the BioTrackTHC with a disposed status. The Director must ensure the entire batch is properly recorded in the system as disposed and the entire batch is removed from quarantine and disposed of in accordance with company policies and procedures.

DISPOSAL METHOD

All batches that require disposal will be treated in a manner which renders the medical Derivative Product unrecoverable. Any packaging that can be salvaged without any risk of contamination or recycled shall be noted in the disposal record of the BioTrackTHC. Medical Derivative Products will be mixed with organic waste such as wood shavings or used plant media incorporating the cannabis waste so that the resulting mixture renders the cannabis waste unusable. Once such cannabis waste has been rendered unusable it may be:

- Disposed of with an appropriately licensed solid waste management facility approved by the Chief Executive Officer; or
- If the material mixed with the cannabis waste is organic material, the mixture may be composted.

STORAGE & TRANSPORT

All medical cannabis materials and finished products will be held under secured quarantine and securely stored until they can be properly destroyed. All of the above cannabis materials and cannabinoid containing products will be transported in a locked and secure storage compartment via a transporting vehicle. All shipments of material designated for destruction shall travel from the manufacturing facility directly to an approved medical waste disposal facility. All transport vehicles will be staffed or accompanied by a minimum of two company employees and at least one company transport team member shall remain with the vehicle at all times until these material are received and quarantined at the designated site.

Chestnut Hill Tree Farm will utilize the services of an environmental waste hauler for laboratory waste, a medical waste hauler for finished products disposal, and will compost cannabis plant materials on-site. The Facilities Manager is responsible for the company's hazardous and controlled substance waste policies and procedures.

FEDERAL, STATE, AND LOCAL REQUIREMENTS

The Facilities Manager will manage the company's waste management program and will ensure compliance with:

- US EPA regulations (40 CFR 260-273)
- Florida Department of Environmental Protection regulations
- Orange County regulations
- DEA Disposal of Controlled Substances regulations
- All other applicable regulations

WASTE DISPOSAL LOG

All waste disposed of will be recorded in the waste disposal log including:

- The date of disposal;
- The type and quantity disposed of;
- The manner of disposal; and
- The name of the employee, patient, or caregiver who supplied the waste if applicable.

LIQUID WASTE REQUIREMENTS

Liquid waste containing nutrient residues, cannabis, or by-products of cannabis processing shall be disposed of in compliance with requirements for discharge into surface water, groundwater, and sewers, or disposed of in an industrial wastewater holding tank.

SOLVENT WASTE

The company has elected to use CO_2 extraction for its cannabinoid processing. The Waters systems selected are closed loop systems that recapture all solvents. No solvent waste will result from these systems.

LABORATORY WASTE

The laboratory will dispose of flammable solvents as well as other waste streams with a certified laboratory waste disposal company. To dispose of any leftover cannabis that was not used in the sample analysis process the lab staff will place that cannabis, products, and containers inside a waste disposal drum. The drum at time of disposal will generally contain about 70% liquid lab waste (flammable solvents, etc.) and about 30% solid waste (containers, vials, plates).

The cannabis and Derivative Products that are disposed of are rendered unrecognizable and unusable once inside the drum and saturated in solvent. The waste disposal company will be the last person in the chain of custody as drums are incinerated or disposed of in accordance with state and local laboratory waste disposal guidelines.

The company will be aware of what is being disposed of and will also be aware of the hazards associated with the solvents that are inside the drum and follow all flammable/hazardous solvent disposal procedures as mandated by Florida regulations.

UNAUTHORIZED DESTRUCTION OF CANNABIS

The Chief Executive Officer will report any verifiable incident of unauthorized destruction of cannabis to law enforcement as needed. All company employees will report the unauthorized destruction of cannabis to the appropriate supervisor immediately. Unauthorized disposal of cannabis may be cause for termination.

BIOTRACKTHC

BioTrackTHC's inventory management tools track unusable cannabis (e.g., outdated, damaged, deteriorated, mislabeled, or contaminated) and cannabis waste by weight and barcode throughout every phase of Derivative Production as well as returns and recalls in the retail phase. Upon destruction, the system can generate a destruction report. The system also allows for the electronic authentication of the witnesses to the destruction through either a four-digit pin number or a biometric scan. To clarify, BioTrackTHC does not simply delete the data related to the waste; rather, the system evidences the lifecycle of every original plant barcode with an auditable trail to either retail sale or verified destruction.

BIOTRACKTHC

Chestnut Hill Tree Farm has selected BioTrackTHC as the provider of its seed to sale tracking systems. BioTrackTHC provides effective cutting-edge technology solutions for the emerging legal cannabis industry that (1) prevents product theft; (2) assists business owners with running their cultivating, packaging, and retail operations more profitably and to better comply with the law; (3) all without leaving sensitive business and consumer data vulnerable in the cloud. Specifically, BioTrackTHC is the industry's only true seed to sale software system with enterprise resource planning, complete inventory tracking, point of sale, marketing, financial reporting and regulatory compliance features. And because it is a server based system with advanced security features, no one, not even the BioTrackTHC team can access business or consumer information without their permission.

BioTrackTHC was formed in 2007 with the goal of developing software solutions that advance public safety in the medical industry by preventing prescription drug fraud and drug diversion. To that end, BioTrackTHC created biometric based technologies that provide transparent patient access to treatment and medication. The development of biometric medical software technologies led to securing two U.S. technology patents (US 8,086,720 & US 8,335,697) and a Canadian patent (CA 2,715,969). Further BioTrackTHC software has undergone the rigorous SAS 70 internal controls technology audit. Our hands on experience in the industry have led to our consulting and developing systems for the Drug Enforcement Agency ("DEA") and the High Intensity Drug Trafficking Area ("HIDTA") Program.

Most recently, BioTrackTHC ™ was contracted by the State of Washington for the first legal cannabis state monitoring and BioTrackTHC in the United States. Development and implementation for the State of Washington traceability system was completed ahead of schedule. From our experience and understanding of governmental regulations, in 2010 we went on to shift our focus and create and develop the premier commercial seed-to-sale tracking software solution tailored specifically to meet the unique needs of a government regulated industry BioTrackTHC was developed specifically for cannabis tracking and is the only seed-to-sale software vetted by a government agency. BioTrackTHC is both robust, secure, and feature rich enough to be the complete solution for cultivators, processors, and retailers in over 1,100 locations in 18 states, the District of Columbia, and Canada. For over four years, the company has expanded it's footing in the industry by continuing to support governmental agencies by adapting and providing software enhancements that guarantee state specific compliance of BioTrackTHC clients. Our software allows users to easily remain transparent and accountable by maintaining accurate real-time data and sound reporting through an unbreakable audit chain that can easily track the full lifecycle of legal cannabis from production, testing, transportation, destruction, and sale. To date over 400 million grams of cannabis have been traced from seed-to-sale through BioTrackTHC applications.

BioTrackTHC has formed a Collaborative Clinical Development Alliance to help facilitate an easy web patient interface for collecting actionable follow up data related to the ever-evolving cannabis industry. BioTrackTHC has created iKush.com, the first real-time direct to patient web portal for easily locating cannabis dispensing facilities with accurate inventory levels. After a patient is associated and validated by the respective dispensing facility, iKush allows the patient a simplified way to research and pre-order medical cannabis.

Patients will be associated with a specific dispensary and will be authorized by the dispensary in order to participate. Each patient will have their own iKush dashboard upon logging into the website. The dashboard will display patient history with easy to use patient information collection forms. These collection forms will create the foundation for unheralded insight into the long term effects of medicinal cannabis. Our intentions are to continue to evolve and grow with Minnesota Medical Solutions while continuing to lead the industry. The required data collection points will

produce actionable intelligence creating the first real time patient management platform for the cannabis industry. BioTrackTHC is fully HIPAA compliant and has undergone strict SAS 70 DEA certification.

The BioTrackTHC Inventory Management System offers users with a unique solution that tracks every level of the growth process from cultivation to distribution. Every plant, seed or clone is assigned a unique non-repeatable 16 digit barcode number. Once the flower is batched after being harvested, each batch is given a new barcode while still being associated with the original source barcode. Every batch of product is separated in the inventory control module by the individual barcode for complete accountability and recall protocol. BioTrackTHC technology allows the producer to monitor differentiations in the growth process by entering production notes or information that doesn't have pre-defined fields within the software. The real-time feature tracks any data changes made to the system, the person responsible for making the changes and the time it was made.

Waste

Location	Room	Inventory type	User	Date	Quantity
"Grow"House	Drying Room	Stems	gwalorski	06/11/2014 02:18 PM	500.00
"Grow"House	Flowering	Trim	gwalorski	06/11/2014 02:19 PM	250.00
"Grow"House	Drying Room	Stems	gwalorski	06/13/2014 12:01 PM	400.00
"Grow"House	Flowering	Vegetation Trim	gwalorski	06/13/2014 12:02 PM	1000.00
"Grow"House	Drying Room	Sugar Leaf	gwalorski	06/13/2014 01:28 PM	400.00
"Grow"House	Drying Room	Stems	gwalorski	06/13/2014 01:29 PM	400.00
"Grow"House	Flowering	Trim	gwalorski	06/13/2014 01:30 PM	1000.00
"Grow"House	Drying Room	Sugar Leaf	gwalorski	06/19/2014 02:52 PM	700.00
"Grow"House	Drying Room	Stems	gwalorski	06/19/2014 02:54 PM	700.00
"Grow"House	Flowering	Trim	gwalorski	06/19/2014 02:55 PM	400.00

Notes **Strain Notes** **Additives**

Individual Note Group Note

Date	Phase	User	Subject
08/05/2014	Flowering	gwalorski	watered the room
08/28/2014	Flowering	gwalorski	Watered the room

Watered the room

New Save

Every step of the supply chain is tracked with real-time solutions. The inventory conversion features are fully tracked and documented by the Inventory Forensics Report, dispensed logs and Sales Reports. Once the product is selected for distribution, it is priced and sold to a patient using the customer point-of-sale screen within the system. BioTrackTHC enables the business to collect, store, and retrieve all data and activity. All inventory records, patient records, recall reports, sales/transaction records, product disposal records, and all scanned documents can be accessed at any time (real time), either in-system or through the report creation tool. Though system actions can be adjusted or voided, at no time is any data ever fully deleted as BioTrackTHC maintains a log of every action, including adjustments and voids, so that the entire history of the system may be reconstructed. The availability and report ability of the system data enables the said entity to produce any information necessary for an inspection.

Part 3.C.4.n. Access to specialized resources or expertise regarding data collection, security, and tracking

BioTrackTHC can adjust inventory and always requires a reason for removal when utilizing the inventory adjustment feature. Product in need of quarantine can be separated from bulk and placed in the designated area. Inventory destruction can be initiated through the system requiring documentation of destruction purpose and/or approved method as well as the employee performing the action. Although the inventory can be adjusted or voided, at no time is any data ever fully deleted as BioTrackTHC maintains a log of every action, including adjustments and voids, so that the entire history of the system may be reconstructed. The availability and report ability of the system data enables the said entity to produce any information necessary for the OCU during an inspection or at their request.

PERSONNEL

In addition to the specialized cannabis tracking system, BioTrackTHC, the company has a team members with expertise available for tracking purposes. These experts include:

BRADY BLAKE

As a quality control manager at Colorado Alternative Medicine, Blake gained extensive experience implementing and operating Colorado's State mandated tracking software system, Marijuana Inventory Tracking System, which efficiently tracks each crop from seed-to-sale. He believes his experience using the company's prior point-of-sale inventory software program, MMJ Freeway, provided a smooth transition to the use of a more advanced and efficient technology base. In 2013, Blake was promoted to a senior management position. He became responsible for the care and tracking of over 4,000 plants and approximately twenty new employees in a grow facility housing 240,000 watts of flower production.

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JILL LAMOUREUX

Jill Lamoureux has been a cannabis industry frontrunner in the State of Colorado since 2008, when she and her husband created one of the Colorado's most respected multi-location dispensing operations. Their branches of business consisted of four retail stores, three cultivation operations, and one cannabis kitchen. As a former dispensary and cultivation owner and operator, she brings first-hand experience with tracking all cannabis plants grown in a particular harvest. In 2010, Lamoureux worked with the State of Colorado's Medical Marijuana Enforcement Division ("MMED") to develop the first statewide medical cannabis regulations regarding tracking, transparency reporting, and compliance. These regulations required every cannabis-producing plant to be tracked by the MMED through each stage of its life, from cultivation to point of sale. Since 2013, Lamoureux has served as a subject matter expert consulting to the BOTEC Analysis Corporation in cannabis regulation and policy. Recently, she provided aid to the BOTEC team advising Washing State on rule-making issues for recreational cannabis operation, including regulations concerning tracking cannabis crops from seed

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BioTrackTHC™ provides effective cutting edge technology solutions for the emerging legal marijuana industry that (1) prevents product theft; (2) assists business owners with running their cultivating, packaging, and retail operations more profitably and to better comply with the law; (3) all without leaving sensitive business and consumer data vulnerable in the cloud. Specifically, BioTrackTHC™ is the industry's only true seed to sale software system with enterprise resource planning, complete inventory tracking, pointofsale, marketing, financial reporting and regulatory compliance features. And because it is a server based system with advanced security features, customers can rest assured that no one, not even the BioTrackTHC™ team can access their business or consumer information without their permission. This document confirms BioTrackTHC™'s intentions to enter into a formal agreement with Chestnut Hill Tree Farm to provide software solutions guaranteed to meet the Florida Department of Health reporting, regulation, and compliance guidelines for medical marijuana producer facilities in the event that you obtain an authorized license. We appreciate your consideration of BioTrackTHC™ and look forward to assisting you in your efforts to secure a license. BioTrackTHC™ is eager to enter into a software solution agreement with you upon your secured license

Patrick Vo
Chief Operating Officer

Company Profile

BioTrackTHC™ was formed in 2007 with the goal of developing software solutions that advance public safety in the medical industry by preventing prescription drug fraud and drug diversion. To that end, BioTrackTHC™ created biometric based technologies that provide transparent patient access to treatment and medication. The development of biometric medical software technologies led to securing two U.S. technology patents (US 8,086,720 & US 8,335,697) and a Canadian patent (CA 2,715,969). Further BioTrackTHC™ software has undergone the rigorous SAS 70 internal controls technology audit. Our hands on experience in the industry have led to our consulting and developing systems for the Drug Enforcement Agency (DEA) and the High Intensity Drug Trafficking Area (HIDTA) Program.

Most recently, BioTrackTHC ™ was contracted by the State of Washington for the first legal marijuana state monitoring and inventory tracking system in the United States. Development and implementation for the State of Washington traceability system was completed ahead of schedule. From our experience and understanding of governmental regulations, in 2010 we went on to shift our focus and create and develop the premier commercial seed-to-sale tracking software solution tailored specifically to meet the unique needs of a government regulated industry BioTrackTHC™ was developed specifically for marijuana tracking and is the only seed-to-sale software vetted by a government agency. BioTrackTHC™ is both robust, secure, and feature rich enough to be the complete

solution for cultivators, processors, and retailers in over 1,100 locations in 18 states, the District of Columbia, and Canada. For over four years we have expanded our footing in the industry by continuing to support governmental agencies by adapting and providing software enhancements that guarantee state specific compliance of BioTrackTHC™ clients. Our software allows users to easily remain transparent and accountable by maintaining accurate real-time data and sound reporting through an unbreakable audit chain that can easily track the full lifecycle of legal marijuana from production, testing, transportation, destruction, and sale. To date over 400 million grams of marijuana have been traced from seed-to-sale through BioTrackTHC™ applications.

Collaborative Clinical Research Alliance Program

BioTrackTHC™ has formed a Collaborative Clinical Development Alliance to help facilitate an easy web patient interface for collecting actionable follow up data related to the ever-evolving cannabis industry. BioTrackTHC™ has created iKush.com, the first real-time direct to patient web portal for easily locating cannabis dispensing facilities with accurate inventory levels. After a patient is associated and validated by the respective dispensing facility, iKush allows the patient a simplified way to research and pre-order medical cannabis.

Patients will be associated with a specific dispensary and must be authorized by the dispensary in order to participate. Each patient will have their own iKush dashboard upon logging into the website. The dashboard will display patient history with easy to use patient information collection forms. These collection forms will create the foundation for unheralded insight into the long term effects of medicinal cannabis. Our intentions are to continue to evolve and grow with Minnesota Medical Solutions while continuing to lead the industry. The required data collection points will produce actionable intelligence creating the first real time patient management platform for the cannabis industry. BioTrackTHC™ is fully HIPAA compliant and has undergone strict SAS 70 DEA certification. Our commitment to excellence, transparency, and accountability are part of our core fundamental infrastructure.

3101 N. Federal Highway

Suite 400

Fort Lauderdale, FL 33306

BioTrackTHC has compiled this precise support document to satisfy The State of Florida Compassionate Medical Cannabis Act of 2014 (Senate Bill 1030)

This document confirms BioTrackTHC's intentions to enter into a formal agreement with Chestnut Tree Farm to provide software solutions guaranteed to meet the State of Florida Department of Health Office of Compassionate Use requirements for a Low-THC Cannabis
Dispensing Organization should you obtain an authorized license.

We appreciate your consideration of BioTrackTHC and look forward to assisting you in your efforts to secure a license. BioTrackTHC is eager to enter into a software solution agreement with you upon your secured license.

Florida Application Support Document

Please attach the documentation that provides the information listed in Rule 64-4.002 including (when appropriate) the name, position, and resume' of the employee(s) who provides the knowledge or experience explained for each item shown below:

A. Cultivation (30%)

1. Technical Ability (4.002(2)(a)) [25%]

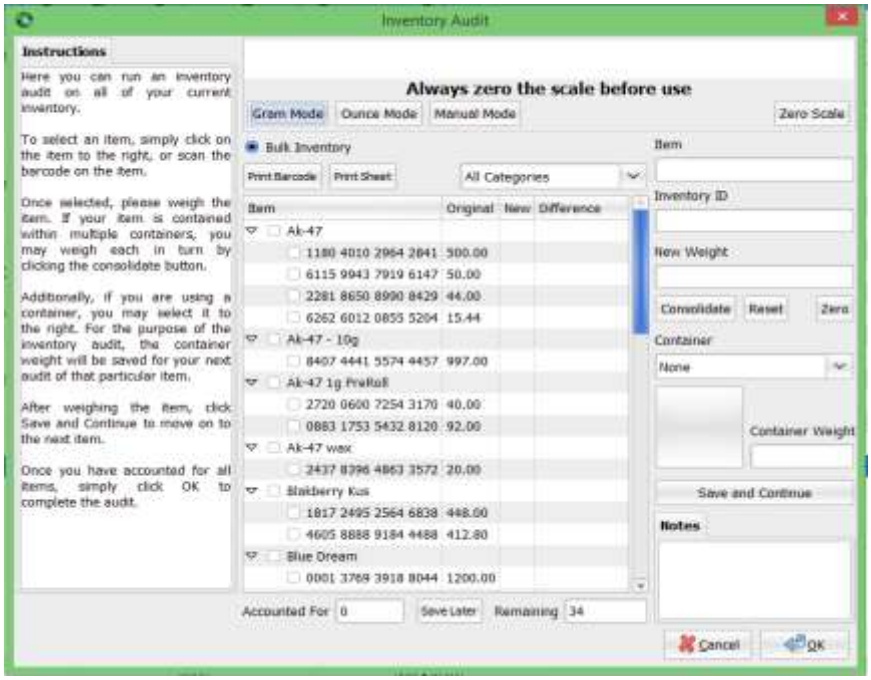
j: Experience with tracking each plant in a harvest

BioTrackTHC's Cultivation Management System offers users with a unique solution that tracks every level of the growth process from cultivation to distribution. Every plant, seed or clone is assigned a unique non-repeatable 16 digit barcode number. Once the flower is batched after being harvested, each batch is given a new barcode while still being associated with the original source barcode. Every batch of product is separated in the inventory control module by the individual barcode for complete accountability and recall protocol. BioTrackTHC technology allows growers to assign plants into multiple rooms, giving coordination and direct view of the entire cultivation facility. Users can access the Plant Derivatives Pedigree feature to run a report on any plant, batch, plant derivative, or product, providing full visibility of plant information for regulatory agencies.

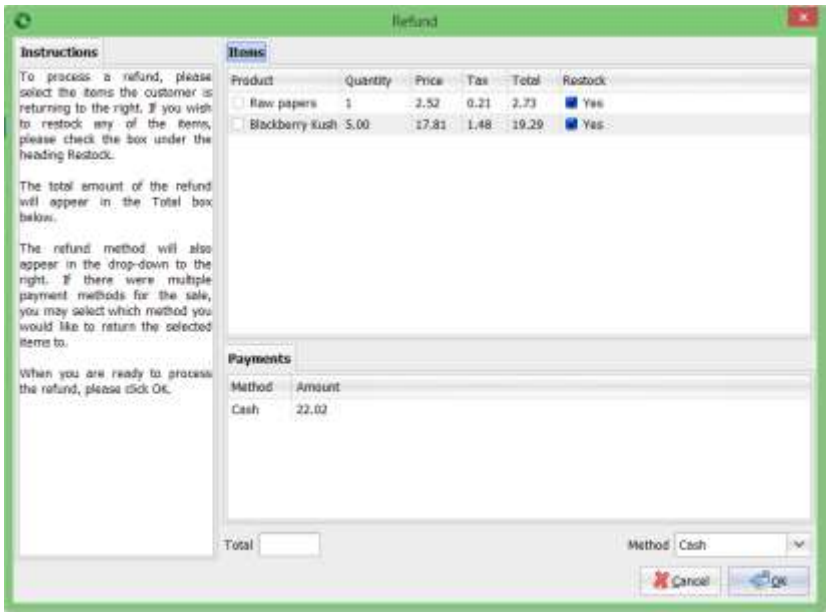
m: Experience with recalls

BioTrackTHC™ enables the business to collect, store, and retrieve all data and activity. All inventory records, patient records, recall reports, sales/transaction records, product disposal records, and all scanned documents can be accessed at any time (real time), either in-system or through the report creation tool. Though system actions

can be adjusted or voided, at no time is any data ever fully deleted as BioTrackTHC™ maintains a log of every action, including adjustments and voids, so that the entire history of the system may be reconstructed. The availability and report ability of the system data enables the said entity to produce any information necessary for the DOH during an inspection or at their request. The Plant/Inventory Historical Report has the ability to trace the source plants for a given product, any flower or byproducts created from those plants as well as any wholesale or retail sale with the contact information for each person it was sold to. This report tracks every gram contained in a batch, including but not limited to all products derived from the plant, the contact information for the purchaser, and all vendor information and transport logs.



In the event of a recall, permitted users can quickly pull reports of all products and transactions associated with a specific plant(s), batch or strain. Within the system the licensed entity will be able to quickly and easily find the remaining product, the locations (i.e. patients) delivered to as well as all sources and derivatives of the product. Once the affected individuals have been identified, because the individual contact preferences have already been logged, timely communication is accessible. BioTrackTHC™ also provides a method of sending SMS(text) message or emails, which can even be targeted to just the patients who've purchased a specific product within a given time period, (all at no cost or SMS usage rates to the patients).



2. Infrastructure (4.002(2)(e)) [25%]

a. Vehicles that will be used to transport product among cultivating, processing, and dispensing facilities;

Transportation manifests are featured in the system to monitor turn-by-turn directions and provide an estimated route time. The entire logistics process is tracked, permitting the surveillance of every order from door to door. The transporter establishes a set route that can be viewed by authorized users. Way-points can be generated just in case the transporter places an audit on the shipment midway through the transport.

b. Communication systems;

BioTrackTHC™ has messaging and email capabilities within the system. This allows managers and employees to communicate with one another without having to open another program or use their cellphones. A manager can send a task list to an employee that is viewable on the same screen where they are inputting data or performing any function within the system.

3. Premises, Resources, Personnel (4.002(2)(c)) [25%]

g. Back-up systems for all cultivation systems;

BioTrackTHC enables the business to collect, store, and retrieve all data and activity -- with respect to inventory records, inventory-tracking records, supplier records, patient records, client-records, employee records, recall reports, quarantine and waste reporting, sales/transaction records, disposal records, and all scanned documents -- at any time (real time), either in-system or through the report creation tool. Though system actions can be adjusted or voided, at no time is any data ever fully deleted as BioTrackTHC™ maintains a log of every action, including adjustments and voids, so that the entire history of the system may be reconstructed. The availability and report ability of the system data enables the said entity to produce any information necessary for the DOH during an inspection or at their request.

4. Accountability (4.002(2)(d)) [25%]

c. Diversion and trafficking prevention procedures;

d. A facility emergency management plan;

e. System for tracking low-THC source plant material throughout cultivation;

f. Inventory control system for low-THC cannabis;

Upon propagation, BioTrackTHC™ automatically assigns a globally unique non-repeatable 16-digit barcode number to every plant. This barcode follows the plant through its entire product life cycle. The system will also track the precise location of every given plant within a designated room, bed or plant table using an 'abc, 123' grid base. Throughout the production process, the licensed producer may enter production notes into the plant-specific inventory record (i.e. events or any required notations that do not currently have pre-defined fields within the system). Upon harvest the system will batch designated plants together and assign a unique barcode to the collection, although the plants are grouped together during the harvest the individual plant barcodes are associated and cataloged within the batch inventory details. All flower, waste, sugar leaf, and other material will be collected, measured and associated appropriately to the original plant barcodes. These weights are also entered using vertically integrated scales to diminish the possibility of human error or manual manipulation. The system can also record both the wet and dry weights of flower material to track moisture loss percentages. The product can be notated and sampled at this juncture for testing purposes. Once testing results are retrieved, they can be directly associated with the product batches.

g. Policies and procedures for recordkeeping;

h. Methods of screening and monitoring employees;

The system prevents unauthorized system access or actions via user PIN, fingerprint scan, or username and password. Every system action records not only the effect of the action, but a timestamp and the identity of

the system user performing the action, providing a full auditable trail that is retrievable at any time, and may be produced in BioTrackTHC's reporting tool (e.g., Forensics Report). These accountability features enable a user to identify the reasons behind any discrepancies, should any unexplainable material losses occur.

i. Personnel qualifications and experience with chain of custody or other tracking mechanisms;

l. Waste disposal plan; and

BioTrackTHC's inventory management tools track unusable marijuana (e.g., outdated, damaged, deteriorated, mislabeled, or contaminated) and marijuana waste by weight and barcode throughout every phase of cannabis production as well as returns and recalls in the retail phase. Upon destruction, the system can generate a destruction report. The system also allows for the electronic authentication of the witnesses to the destruction through either a four-digit pin number or a biometric scan. To clarify, BioTrackTHC does not simply delete the data related to the waste; rather, the system evidences the lifecycle of every original plant barcode with an auditable trail to either retail sale or verified destruction.

m. Access to specialized resources or expertise regarding data collection, security, and tracking.

BioTrackTHC Inventory Management System offers users with a unique solution that tracks every level of the growth process from cultivation to distribution. Every plant, seed or clone is assigned a unique non-repeatable 16 digit barcode number. Once the flower is batched after being harvested, each batch is given a new barcode while still being associated with the original source barcode. Every batch of product is separated in the inventory control module by the individual barcode for complete accountability and recall protocol. BioTrackTHC technology allows the producer to monitor differentiations in the growth process by entering production notes or information that doesn't have pre-defined fields within the software. The real-time feature tracks any data changes made to the system, the person responsible for making the changes and the time it was made.

Waste

Location	Room	Inventory type	User	Date	Quantity
"Grow"House	Drying Room	Stems	gwalorski	06/11/2014 02:18 PM	500.00
"Grow"House	Flowering	Trim	gwalorski	06/11/2014 02:19 PM	250.00
"Grow"House	Drying Room	Stems	gwalorski	06/13/2014 12:01 PM	400.00
"Grow"House	Flowering	Vegetation Trim	gwalorski	06/13/2014 12:02 PM	1000.00
"Grow"House	Drying Room	Sugar Leaf	gwalorski	06/13/2014 01:28 PM	400.00
"Grow"House	Drying Room	Stems	gwalorski	06/13/2014 01:29 PM	400.00
"Grow"House	Flowering	Trim	gwalorski	06/13/2014 01:30 PM	1000.00
"Grow"House	Drying Room	Sugar Leaf	gwalorski	06/19/2014 02:52 PM	700.00
"Grow"House	Drying Room	Stems	gwalorski	06/19/2014 02:54 PM	700.00
"Grow"House	Flowering	Trim	gwalorski	06/19/2014 02:55 PM	400.00

Notes **Strain Notes** **Additives**

Individual Note Group Note

Date	Phase	User	Subject
08/05/2014	Flowering	gwalorski	watered the room
08/28/2014	Flowering	gwalorski	Watered the room

Watered the room

New Save

Every step of the supply chain is tracked with real-time solutions. The inventory conversion features are fully tracked and documented by the Inventory Forensics Report, dispensed logs and Sales Reports. Once the product is selected for distribution, it is priced and sold to a patient using the customer point-of-sale screen within the system. BioTrackTHC enables the business to collect, store, and retrieve all data and activity. All inventory records, patient records, recall reports, sales/transaction records, product disposal records, and all scanned documents can be accessed at any time (real time), either in-system or through the report creation tool. Though system actions can be adjusted or voided, at no time is any data ever fully deleted as BioTrackTHC maintains a log of every action, including adjustments and voids, so that the entire history of the system may be reconstructed.

The availability and report ability of the system data enables the said entity to produce any information necessary for an inspection.

BioTrackTHC™ can adjust inventory and always requires a reason for removal when utilizing the inventory adjustment feature. Product in need of quarantine can be separated from bulk and placed in the designated area. Inventory destruction can be initiated through the system requiring documentation of destruction purpose and/or approved method as well as the employee performing the action. Although the inventory can be adjusted or voided, at no time is any data ever fully deleted as BioTrackTHC™ maintains a log of every action, including adjustments and voids, so that the entire history of the system may be reconstructed. The availability and report ability of the system data enables the said entity to produce any information necessary for the DOH during an inspection or at their request.

B. Processing (30%)

2. Infrastructure (4.002(2)(e)) [25%]

a. Vehicles that will be used to transport product among cultivating, processing, and dispensing facilities;

Transportation manifests are featured in the system to monitor turn-by-turn directions and provide an estimated route time. The entire logistics process is tracked, permitting the surveillance of every order from door to door. The transporter establishes a set route that can be viewed by authorized users. Way-points can be generated just in case the transporter places an audit on the shipment midway through the transport.

Transport documentation provides the following:

1. employee identity and badge number
2. vehicle vin number
3. time stamped batch/lot number
4. total quantity being transported

3. Premises, Resources, Personnel (4.002(2)(c)) [25%]

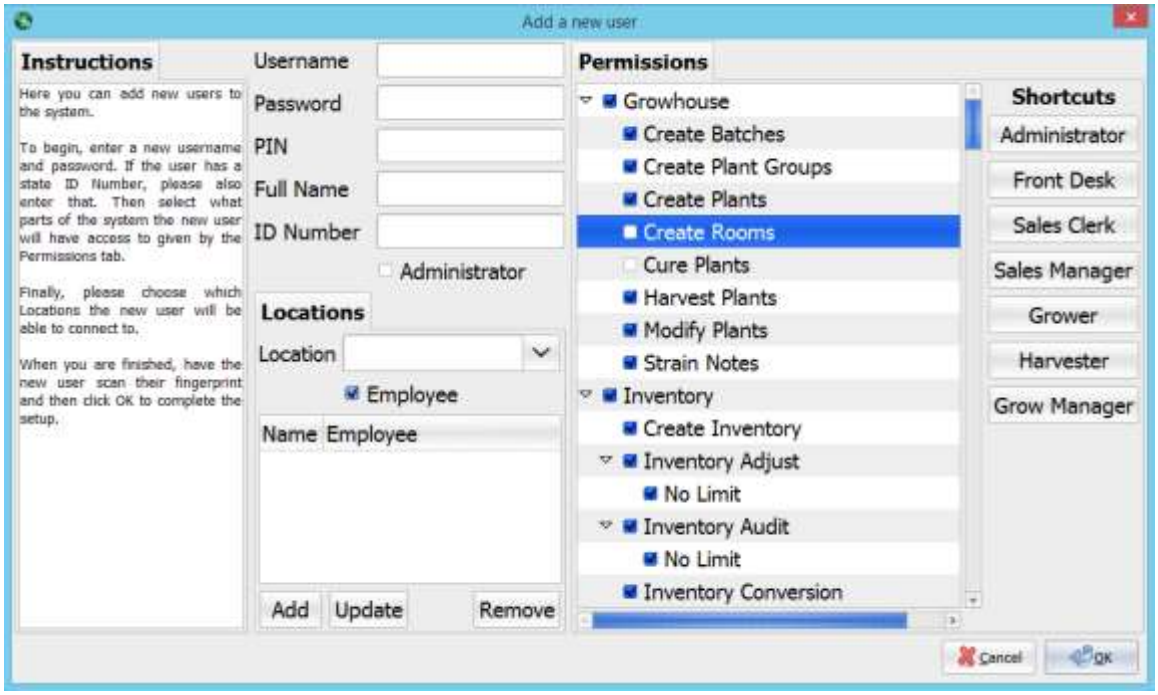
f. Back-up systems for all processing systems;

g. Description of the areas proposed for the processing of Derivative Products, including the following:

vi. Computer systems and software; and

BioTrackTHC has the inclusive capability to track all measureable aspects of a marijuana plant. In addition to the literal weights of the cannabis, the system can associate 'usable marijuana' quantities with any created infused marijuana products. The system's product conversion tools enable the quantities of usable marijuana as well as associated conversion wastes to be tracked with ease. This ensures that whether the plants and/or plant products are in their relative cultivation or processing phases, they can be fully accounted for and tracked.

The system can adjust inventory and always require a reason for removal when utilizing the inventory adjustment feature, also it has an auditing feature that can be used to track loss of product due to diversion or theft.



4. Accountability (4.002(2)(d)) [25%]

c. Diversion and trafficking prevention procedures for the processing facilities;

e. System for tracking low-THC source plant material throughout processing;

f. Inventory control system for low-THC cannabis and Derivative Products;

g. Policies and procedures for recordkeeping;

j. Methods of screening and monitoring employees;

Every step of the supply chain is tracked with real-time solutions. The inventory conversion features are fully tracked and documented by the Inventory Forensics Report, dispensed logs and Sales Reports. Once the product is selected for distribution, it is priced and sold to a patient using the customer point-of-sale screen within the system. BioTrackTHC enables the business to collect, store, and retrieve all data and activity. All inventory records, patient records, recall reports, sales/transaction records, product disposal records, and all scanned documents can be accessed at any time (real time), either in-system or through the report creation tool. Though system actions can be adjusted or voided, at no time is any data ever fully deleted as BioTrackTHC maintains a log of every action, including adjustments and voids, so that the entire history of the system may be reconstructed. The availability and report ability of the system data enables the said entity to produce any information necessary for an inspection.

C. Dispensing (15%)

1. Technical Ability (4.002(2)(a)) [25%]

d. Experience gathering and managing data, i.e. data on patient reactions to products dispensed;

g. Training programs for employees addressing:

i. The Health Insurance Portability and Accountability Act (HIPAA);

BioTrackTHC™ is a secured program that is password protected and also can be set for Biometric Fingerprint scanning to ensure only authorized personnel will be able to access secure documentation within the system. All the information is stored on a local server that is firewall protected from any outside presence.

Our intentions are to continue to evolve and grow with the FL DOH while continuing to lead the industry. The required data collection points will produce actionable intelligence creating the first real time patient management platform for the cannabis industry. BioTrackTHC™ is fully HIPAA compliant and has undergone strict SAS 70

DEA certification. Our commitment to excellence, transparency, and accountability are part of our core fundamental infrastructure.

2. Infrastructure (4.002(2)(e)) [25%]

d. A HIPAA compliant computer network utilized by all facilities;

BioTrackTHC™ is fully HIPAA compliant and has undergone strict SAS 70 DEA certification. Our commitment to excellence, transparency, and accountability are part of our core fundamental infrastructure. The system is a secured program that is password protected and also can be set for Biometric Fingerprint scanning to ensure only authorized personnel will be able to access secure documentation within the system. All the information is stored on a local server that is firewall protected from any outside presence.

e. Vehicles that will be used to transport product among cultivating, processing, and dispensing facilities;

BioTrackTHC™ allows for the creation of a Transport Manifests clearly displaying vendor and transferee information. The manifest can be created in advance and sent to the DOH, law enforcement and distribution site. The manifest will include the driver and license information, vehicle identification number (VIN), origin and destination registration numbers and itemized shipment list. The itemized shipment list contains a detailed record of the plants and/or plant materials in transit. This continues the unique barcode number showing the unbroken chain of custody and transparency. Manifests can also include turn by turn directions and an estimated route time ensuring maximum transparency, diversion and accountability. The manifests provided also contain signature lines creating another level of accountability confirming proper receipt has occurred. This information can be maintained, verified and scanned directly into the BioTrackTHC™ system for clerical preservation. The manifest is archived within the system and can be quickly made available upon request by the commissioner or law enforcement.

g. Hours of operation of each dispensing facility; and

Within BioTrackTHC™ there are numerous sales and inventory reports that can identify the exact time a sale was made, the items dispensed and the employee that made the transaction. Additionally BioTrackTHC™ requires that each patient be added to the system with all relevant information before a sale can be made. This information includes the quantity that that patient is allowed to purchase. Patient sales amounts can be automatically set within the system to prevent any transaction outside of permitted limits. The time sales occur can be set in the system to prevent sales outside of hours of operation.

3. Premises, Resources, Personnel (4.002(2)(c)) [25%]

f. Description of the methods proposed for the dispensing of Derivative Products, including the following:

i. Accessibility of dispensing facilities, e.g., centrally located to several populated areas, located on a main roadway, not in a high crime area, et cetera;

4. Accountability (4.002(2)(d)) [25%]

c. Diversion and trafficking prevention procedures for the dispensing facilities;

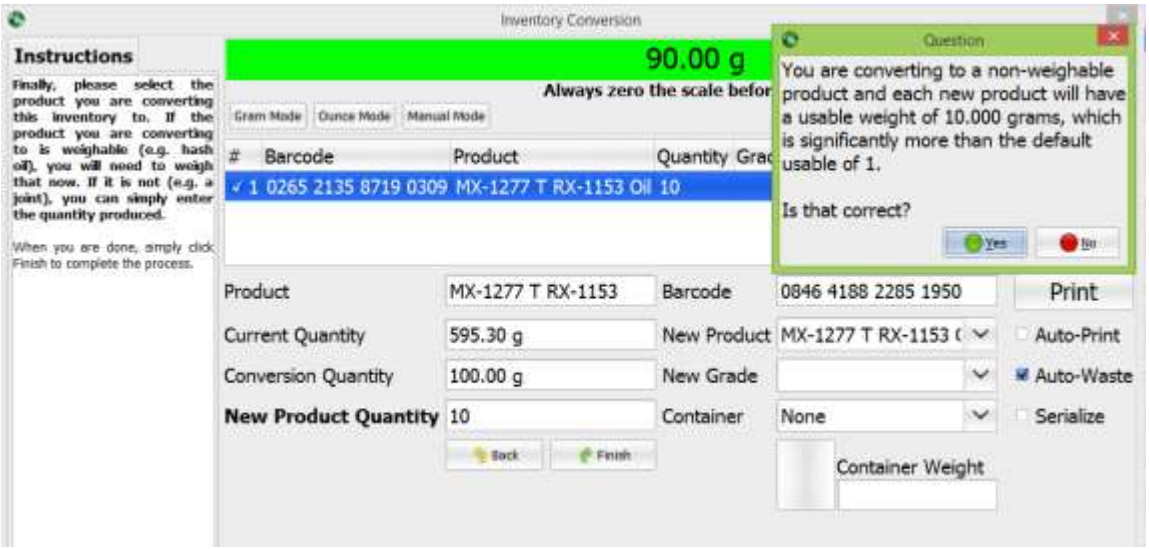
d. A facility emergency management plan for the dispensing facilities;

e. System for tracking Derivative Products throughout dispensing;

f. Inventory control system for Derivative Products;

BioTrackTHC™'s industry leading software was designed specifically for the medical cannabis industry. Every transaction is tracked via employee PIN or biometric fingerprint ensuring complete visibility and chain of custody. Every gram is tracked from seed to sale, recording the entire plant life cycle and who interacted with it at each step. The tracking continues through plant harvest and processing recording each part of the plant, be it flowers or byproducts to be broken down into extracts or oils. All transactions are archived for future reference ensuring complete security, traceability, and accountability.

While BioTrackTHC™ does not handle the physical processing of the plant material; it does track the plant, and plant material, through the process via the 16 digit non-repeatable barcode. Throughout processing, the system creates new 16 digit barcodes recording the transaction and linking to the previous code. This protocol is repeated at each processing transaction creating an unbroken record of the entire product cycle, from *seed to sale*. Processes, employees, and time stamps are recorded to the 16 digit identifier creating a detailed account of all plant interactions.



Finalized end products and intermediate conversion products can be created though the system's inventory control module. These can be anything from, but not limited to, infused raw oils, edibles, concentrates or prepackaged flower. In addition to entering the product, the predetermined amounts of marijuana product within each individual item can be selected. Once entered into the system they will be available in a drop down of eligible conversions within the module itself. During the conversion the system will track the end quantities of the new product, associated waste, and even warn the employee if the suspected infusion quantity is below or exceeds the preselected amounts.

Inventory Audit

Product	Barcode	Old qty	New qty	Difference	Percent	Date
AK-47						
	0129 3807 1592 7867	626.00	626	0.00	0.00	09/16/2014 04
	9498 6908 4835 7565	1445.00	1445	0.00	0.00	09/16/2014 04
	0785 1262 5028 8317	1023.00	1023	0.00	0.00	09/16/2014 04
		3094	3094	0.00	0.00	
AK-47 14G PrePack						
	1765 6039 0269 5149	19.00	19	0.00	0.00	09/16/2014 04
	4263 4025 1220 5789	20.00	20	0.00	0.00	09/16/2014 04
	3219 0714 5137 3585	49.00	49	0.00	0.00	09/16/2014 04
		88	88	0.00	0.00	
AK-47 1G PrePack						
	8165 0818 7138 3716	109.00	109	0.00	0.00	09/16/2014 04
	8864 0848 3592 1099	98.00	98	0.00	0.00	09/16/2014 04
	8557 5634 2531 0431	86.00	86	0.00	0.00	09/16/2014 04
	6475 5090 8044 1748	70.00	70	0.00	0.00	09/16/2014 04
	3980 0831 9570 5042	50.00	50	0.00	0.00	09/16/2014 04
	6907 4877 8047 7931	200.00	200	0.00	0.00	09/16/2014 04
	5666 8886 6878 1019	100.00	100	0.00	0.00	09/16/2014 04
	3945 5163 4101 4937	79.00	79	0.00	0.00	09/16/2014 04

Every new conversion is given a new non-repeatable barcode; however it can be easily hierarchically and chronologically linked with the preceding product state. Sublotting batches will also generate additional barcodes; however the previous barcodes as well as any previously associated testing and notation information will still be readily available.

The aforementioned information can be found in both the system's inventory conversion report and inventory forensics report.

BioTrackTHC has the inclusive capabilities to track all measurable aspects of a marijuana plant. In addition to the literal weights of the cannabis, the system can associate 'usable marijuana' quantities with any created infused marijuana products. The system's product conversion tools enable the quantities of usable marijuana as well as associated conversion wastes to be tracked with ease. This ensures that whether the plants and/or plant products are in their relative cultivation or processing phases, they can be fully accounted for and tracked.

g. Policies and procedures for recordkeeping;

BioTrackTHC™ enables the business to collect, store, and retrieve all data and activity. All inventory records, patient records, recall reports, sales/transaction records, product disposal records, and all scanned documents can be accessed at any time (real time), either in-system or through the report creation tool. Though system actions can be adjusted or voided, at no time is any data ever fully deleted as BioTrackTHC™ maintains a log of every action, including adjustments and voids, so that the entire history of the system may be reconstructed. The availability and report ability of the system data enables the said entity to produce any information necessary for an inspection.

h. Methods of screening and monitoring employees;

BioTrackTHC™ records every plant transaction with an employee PIN or biometric fingerprint scan. Furthermore, the system allows for employee-specific customizable permissions allowing for several layers of added security. This ensures that only specific employees are granted access to permissions such as receiving new inventory, product processing or plant propagation. In reference to internal diversion, the vertical hardware integration with the scales, scanners, barcodes and labels will streamline all processes and diminish the chances of human error or manipulation. Inventory audit logs are also available in the event a discrepancy arises anywhere in the purchase order, transportation or vendor intake process. These reports can be filtered by employee, date, vendor, purchase order, product, or plant for complete transparency and accountability. In addition there is an inventory forensics log that will show every inventory action performed. It is so detailed in fact that unless it is filtered by action, product or date range the information becomes too overwhelming for the average person. When every gram of product is accounted for, all invested parties can rest easy.

Inventory Forensics Report				
Name	Inventory id	Location	Previous quantity	New quantity
AK-47	0129 3807 1592 7867			
		"Grow" Dispensary	626.00	626.00
		"Grow" Dispensary	626.00	626.00
AK-47	0785 1262 5028 8317			
		"Grow" Dispensary	1051.00	1037.00
		"Grow" Dispensary	1051.00	1037.00
Acapulco Gold	0807 4387 4280 7830			
		"Grow" Dispensary	1620.00	1620.00
		"Grow" Dispensary	1620.00	1620.00
Bananna Kush	0970 2042 5113 2514			
		"Grow" Dispensary	112.00	112.00
		"Grow" Dispensary	112.00	112.00

i. Personnel qualifications and experience with chain of custody or other tracking mechanisms;

BioTrackTHC has a biometric chain of custody module that logs every action in real time and the user who performed that action. BioTrackTHC has the ability to integrate with scales to deter employee theft and human error. Every action is time stamped which can be cross referenced with security cameras. All of these functions prevent diversion, abuse, and illegal or unauthorized conduct relating to medical marijuana.

PART 3.D. MEDICAL DIRECTOR

Part 3.D.a. Specialty area, if any;

Specializing in emergency medicine, Dr. Richard Tempel completed his residency program with high honors at Duke University where he was Chief Resident in the Department of Surgery. Dr. Tempel is a member of the American Medical Association (AMA), fellow of the American College of Emergency Physicians (ACEP), Florida Chapter and a fellow of the American Academy of Emergency Medicine (AAEM). He has been a keynote lecturer at the Florida Hospital Emergency Medicine Residency Conference in Orlando multiple times, and additionally discussed emergency ultrasound protocols during the Radiology Forum at the Upper Chesapeake Medical Center in 2008 in Bel Air, Maryland.

As an emergency physician, Dr. Tempel has worked in many hospital emergency rooms, serving patients with critical conditions. His job has been to stabilize patients for referral to the appropriate department for further evaluation. Dr. Tempel has experience with treating conditions that span all areas of medicine. Dr. Tempel has treated many patients who have life-threatening conditions on a regular basis. He has had to evaluate a wide variety of ailments, sometimes with little to no information. For this reason, Dr. Tempel is able to think and act quickly, to make a tentative diagnosis, and determine the appropriate course of treatment for his patients.

Part 3.D.b. Experience with epileptic patients;

Dr. Richard Tempel completed his residency program at Duke University, a leading research center for epilepsy and cancer patients, where he gained significant experience interacting with patients diagnosed with epilepsy and cancer. Dr. Tempel sees thousand of patients annually in the emergency department from around the world, many with both diseases. While interacting with epileptic patients, he interprets their test results, manages their acute seizures, assists them in their conditional needs, and adjusts their medication dosages, when necessary.

Part 3.D.c. Experience with cancer patients;

Dr. Richard Tempel received extensive experience working with cancer patients through his residency at Duke University. During this time, he had the privilege to work at a topnotch research center for cancer patients, gaining expertise experience in treating individuals suffering from the disease. Dr. Tempel currently treats thousands of patients annually, many of whom have been diagnosed with cancer. When treating a patient with a cancerous condition, he deciphers their test results, manages any acute problems, and often treats the side effects of the chemotherapy, depending on their individual conditional needs.

Part 3.D.d. Experience with patients with severe seizures or muscle spasms;

As an emergency physician, Dr. Tempel has seen hundreds of patients with severe seizure disorders and painful muscle spasms, due to a litany of underlying diseases. He has experience stabilizing their potentially life-threatening conditions, interpreting their test results to provide the best therapy, and prescribing medications if needed upon discharge.

Part 3.D.e. Knowledge of the use of low-THC cannabis for treatment of cancer or physical medical conditions that chronically produce symptoms of seizures or severe and persistent muscle spasms;

Dr. Tempel has completed the FMA-approved course on low-THC Cannabis, which includes the research and treatment for cancer or physical medical conditions that chronically produce symptoms of seizures or severe and persistent muscle spasms.

Part 3.D.f. Knowledge of good manufacturing practices;

As the Medical Director for the company, Dr. Richard Tempel brings significant experience in good manufacturing practices due to his several years spent in a laboratory as a research assistant at Johns Hopkins University, Towson University, the University of Maryland College Park, and the University of Maryland - School of Medicine. In these positions, Dr. Tempel became skilled in good laboratory practice which provides a solid base of understanding of good manufacturing practice, similar to good manufacturing practice, used in scientific research laboratories.

Part 3.D.g. Knowledge of analytical and organic chemistry;

Dr. Richard Tempel completed his residency program at Duke University where he was Chief Resident in the Department of Surgery, and graduated holding the titles of Resident and Teaching Resident of the Year in 2006. In order to achieve this position, Dr. Tempel had to develop a deep understand of chemistry and attained high grades in analytical and organic chemistry as an undergraduate at the University of Maryland College Park. In addition, as an undergraduate, Dr. Tempel completed several courses with high grades covering plant science and botany, which incorporated microbiology into each course's structure.

Part 3.D.h. Knowledge of analytical laboratory methods;

Dr. Richard Tempel brings substantial experience and education in analytical laboratory methods. As a research assistant at Johns Hopkins University, Towson University and the University of Maryland, Dr. Tempel applied his knowledge to analytical laboratory methods, developing protocols for best practice management in a scientific laboratory setting.

Part 3.D.i. Knowledge of analytical laboratory quality control, including maintaining a chain of custody;

Dr. Richard Tempel has studied and applied quality control methods in a laboratory environment, including a chain of custody. He has performed research with sensitive patient data and information. As a doctor who regularly sees thousands of patients annually from around the world in the emergency department, Dr. Tempel has had to implement medical analytical protocols, which incorporate best practices and quality control into all operations.

Part 3.D.j. Knowledge of and experience with CBD/low-THC extraction techniques;

Dr. Tempel brings significant knowledge of CBD/low-THC extraction techniques. This unique knowledge was obtained, in part, through the specific training that was necessary to complete the FMA-approved course on low-THC Cannabis. Dr. Tempel's training encompasses the clinical indications for the appropriate use of low-THC

cannabis, the appropriate delivery mechanisms, the contraindications for such use, as well as the relevant state and federal laws governing the ordering, dispensing, and possessing of this substance before beginning work.

Part 3.D.k. Knowledge of CBD/low-THC routes of administration;

While completing the FMA-approved low-THC Cannabis course, Dr. Richard Tempel received significant education regarding the different routes of cannabis administration. Dr. Tempel will have unrestricted access to contact the company's advisors, including Dr. Margaret Gedde, PhD for consulting services. Margaret Gedde, M.D., Ph.D., is a Stanford-trained pathologist and award-winning researcher who founded Gedde Whole Health in 2004 and continues to lead this holistic, integrative medicine practice in both Colorado Springs and Buena Vista, CO.

Dr. Gedde is the founder of the Clinicians' Institute for Cannabis Medicine and the Medical Director of Vibrant Health Clinic. Dr. Gedde has worked with thousands of medical cannabis patients in Colorado since 2004. She treats hundreds of children and adults with epilepsy, cancer, and other chronic conditions seeking cannabis therapy each year. Dr. Tempel will be able to draw on her decade of experience with these patients allowing Chestnut Hill Tree Farm's patients to draw on Dr. Gedde;s knowledge base through Dr. Tempel.

She specializes in the use of cannabis to help patients manage chronic pain, relieve nausea, and better manage their condition while navigating multiple chronic health conditions. Dr. Gedde has experience in using cannabidiol (CBD) as a treatment for multiple indications, including the management of pediatric epilepsy. She presented her work ("Whole Cannabis Extract of High Concentration Cannabidol May Calm Seizures in Highly Refractory Pediatric Epilepsies") before the American Epilepsy Society in 2013. She has been published in 11 peer-reviewed journals.

Dr. Gedde will be an invaluable resource to Dr. Tempel as he learns the Medical Director position, its intricacies, and develops a management style for the dispensary.

Part 3.D.l. Experience in or knowledge of clinical trials or observational studies;

Dr. Tempel brings extensive research experience to the company. A significant portion of his research as an undergraduate, medical student, and physician at Duke University's Medical Center has included clinical trials and observational studies. Holding the title of Chief Resident in the Division of Emergency Medicine at Duke University Medical Center, Dr. Tempel led clinical trials and studies that were put into place to aid in the speedy recovery of patients with life-altering diseases.

Part 3.D.m. Knowledge of and experience with producing CBD/low-THC products;

By completing the FMA-approved low-THC Cannabis course, Dr. Tempel has knowledge of producing CBD/low-THC products.

Part 3.D.n. Experience with or knowledge of botanical medicines;

Dr. Tempel has extensive knowledge and research experience combining plant science to the medical industry. As an undergraduate at the University of Maryland, College Park, Dr. Tempel took several courses in Botany, including classes such as Medicinal and Poisonous Plants. His far-reaching knowledge on the subject shall provide the company with strategic direction and oversight of medical product development that is right for individual patient care.

Part 3.D. Medical Director

Part 3.D.o. Experience with dispensing medications;

As a licensed, practicing emergency physician for nearly eight years in Florida, Dr. Tempel has worked closely with pharmacists and nurses while ordering and dispensing medications for his patients many times per day.

In addition, the company's back-up Medical Director, Dr. Lawrence Erlich, MD has significant experience with dispensing medications. Dr. Erlich is board certified in Addiction Psychiatry and Psychiatry. He has special expertise in several areas including: attention deficit disorder, bipolar disorder, depression, and schizophrenia. As a board member of the American Board of Psychiatry and Neurology and Psychiatry since 1974, he has extensive experience working with patients who have sever psychiatric disorders. His clinical practice deals heavily with patients who suffer from addictions. He has years of experience dispensing medications for patients. Additionally, he has a federal waiver to prescribe Suboxone, a narcotic that is FDA approved and licensed to treat narcotics addicts.

Part 3.D.p. Description of how the medical director will supervise the activities of the Dispensing Organization; and

The Medical Director will supervise the Dispensary Manager in all operations from implementation of anti-diversion protocols to planning education outreach events. The Medical Director and Dispensary Manager are responsible for the development and execution of training for Chestnut Hill Tree Farm, LLC employees who are posted in the dispensing unit. In addition, the Medical Director shall work closely with the Chief Operating Officer, Outreach Manager, and Patient Services Director to provide leadership guiding the dispensary's philosophy, mission, strategy, and goals. The Medical Director reports to the Chief Executive Officer. The Medical Director must remain licensed and in good standing as a physician, as defined by Florida law, at all times while employed by the company. The Medical Director will work closely with the Chief Executive Officer to define, develop, and implement the dispensary's strategies, policies and procedures, and staff training to ensure organizational effectiveness and compliance with rules and regulations.

The Medical Director will also provide support to the company's other operating units assisting with Quality Control procedures, product development, and all other operations that could benefit from the Doctor's experience working closely with patients in the dispensary.

The Dispensary Manager, in coordination with the Medical Director, will maintain accurate dispensing facility personnel records for each employee. Such records must be maintained for at least five years and include:

- All materials submitted to the OCU;
- Documentation of verification of references;
- The job description or employment contract that includes duties, authority, responsibilities, qualifications, and supervision;
- Documentation of all required training, including training regarding privacy and confidentiality requirements, and the signed statement of the individual indicating the date, time, and place he or she received required training and the topics discussed, including the name and title of presenters;
- Documentation of periodic performance evaluations; and
- A record of any disciplinary action taken.

Additionally, the Outreach Manager will report to the Medical Director. The Outreach Manager, in coordination with the Dispensary Manager and Patient Associates, is responsible for developing patient programs and services including patient education, substance abuse assistance, referral programs to other wellness services, and a

hardship grant program. The Medical Director will help coordinate and approve all outreach activities to ensure that the dispensary's staff is properly trained to effectively and accurately educate patients and their legal representatives. The Outreach Manager and Medical Director will plan and market community outreach events, educational sessions, as well as identify local community organizations with which to partner.

Part 3.D.q. Description of how the Dispensing Organization will ensure it has a medical director at all times.

Dr. Tempel will be available all hours the dispensing facility is open, by either being present onsite at the facility, or by electronic communication. This communication could be via telephone, text message, or e-mail. Should Dr. Tempel not be available in the event of a planned absence or an emergency, an independent back-up qualified medical director, Dr. Lawrence Erlich will be on standby to provide any services or guidance required by the company. Additionally, should Chestnut Hill Tree Farm, LLC be approved for a Dispensing Organization additional medical director resources will be become available to the company in the event Dr. Tempel or Dr. Erlich cannot continue to fulfil is duties.

PART 3.E. FINANCIALS

Chestnut Hill Tree Farm, LLC is an Applicant for the Low-THC Cannabis Dispensing Organization Approval. The two member Florida limited liability company operates a tree farm located on approximately 165 acres in Alachua, Florida. The company grows and sells approximately 50 varieties of trees ranging in size from saplings to full-grown specimens. As of December 31, 2014, the Company had approximately 412,000 plantings. The Company is organized as a limited liability corporation and has elected to be treated as an S Corporation for income tax purposes. A conversion from C-Corp to LLC was effected in 2005.

The company is financially stable as shown in its certified financial statements as a standalone entity. The Low-THC Dispensing Organization proposal will be fully funded by a Line of Credit from CBD Equity, LLC. The debt financing is secured by real property assets associated with the proposed cannabis operations including the cultivation and manufacturing facility and one dispensing facility. The debt is secured only by cannabis related assets so that the nursery's existing lines of business and assets are insulated from risk. Control of the Applicant and all of its operations will be retained by its current owners. No interest in the nursery is contemplated at this time for the financier. The agreements governing the Line of Credit transaction are attached for review.

The company has modeled four years of operations. The financial projections were developed by an expert in the field of cannabis operations and adopt a conservative bias. Understanding that the company can ramp-up quickly to meet demand exceeding projections – the focus for the projections was to ensure adequate financing is available for the operation in the "worst case" scenario. As a result, the company has committed financing to cover all construction and capital costs, as well as, a minimum of two years of gross working capital needs, assuming a zero revenue scenario.

The capital budget detailed in the attached 4 year projections includes the cost of securing and maintaining the $5M bond required for operations. Attached is a commitment letter from the bond provider as evidence that the company has provided all necessary financial evidence and operating materials to the surety provider needed to obtain the bond in a timely manner in accordance with legislative requirements. The budget also assumes a large increased in the licensing fee for Dispensing Organizations to ensure sufficient capital resources are available to the operation.

ACSTAR INSURANCE COMPANY
30 SOUTH ROAD • FARMINGTON, CT 06032 • (860) 415-8400

July 1, 2015

Florida Department of Health, Office of Compassionate Use
4052 Bald Cypress Way
Tallahassee, FL 32399

RE: CHESTNUT HILL TREE FARM, LLC
ALACHUA, FL
MEDICAL MARIJUANA DISPENSING ORGANIZATION

[redacted]

In the event that Chestnut Hill Tree Farm, LLC is awarded the above-mentioned contract, ACSTAR Insurance Company, as surety, is prepared to write performance and payment bonds providing that Chestnut Hill Tree Farm, LLC continues to meet ACSTAR Insurance Company's underwriting and collateral requirements.

ACSTAR Insurance Company is rated a VI by A.M. Best and is on the United States Treasury Department's list of approved sureties and is licensed in all 50 states.

Yours very truly,

Henry W. Nozko, Jr.
President

HWNJR/dlp

Part 3.E.a. Certified Financials issued within the immediately preceding 12 months

Please find attached the Chestnut Hill Tree Farm, LLC certified financials for the fiscal year, 2014.

Chestnut Hill Tree Farm, LLC

FINANCIAL STATEMENTS

December 31, 2014

Chestnut Hill Tree Farm, LLC
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December 31, 2014

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Statement of Cash Flows 6

Notes to Financial Statements 7

CRI CARR RIGGS & INGRAM
CPAs and Advisors

Carr, Riggs & Ingram, LLC
4010 N.W. 25th Place
Gainesville, Florida 32606
P.O. Box 13494
Gainesville, Florida 32604

(352) 372-6300
(352) 375-1583 (fax)
www.cricpa.com

INDEPENDENT AUDITOR'S REPORT

To the Members
Chestnut Hill Tree Farm, LLC
Alachua, Florida

We have audited the accompanying balance sheet of Chestnut Hill Tree Farm, LLC (a Florida limited liability corporation) as of December 31, 2014, and we were engaged to audit the related statements of income, changes in members' equity, and cash flows for the year then ended, and the related notes to the financial statements.

Management's Responsibility for the Financial Statements

Management is responsible for the preparation and fair presentation of these financial statements in accordance with accounting principles generally accepted in the United States of America; this includes the design, implementation, and maintenance of internal control relevant to the preparation and fair presentation of financial statements that are free from material misstatement, whether due to fraud or error.

Auditor's Responsibility

Our responsibility is to express an opinion on these financial statements based on conducting the audit in accordance with auditing standards generally accepted in the United States of America. Because of the matter described in the Basis for Disclaimer of Opinion paragraph, however, we were not able to obtain sufficient appropriate audit evidence to provide a basis for an audit opinion on the results of operations or cash flows.

We conducted our audit of the balance sheet in accordance with auditing standards generally accepted in the United States of America. Those standards require that we plan and perform the audit to obtain reasonable assurance about whether the balance sheet is free from material misstatement.

An audit involves performing procedures to obtain audit evidence about the amounts and disclosures in the financial statement. The procedures selected depend on the auditor's judgment, including the assessment of the risks of material misstatement of the financial statement, whether due to fraud or error. In making those risk assessments, the auditor considers internal control relevant to the entity's preparation and fair presentation of the financial statement in order to design audit procedures that are appropriate in the circumstances, but not for the purpose of expressing an opinion on the effectiveness of the entity's internal control. Accordingly, we express no such opinion. An audit also includes evaluating the appropriateness of accounting policies used and the reasonableness of significant accounting estimates made by management, as well as evaluating the overall presentation of the financial statement.

We believe that the audit evidence we have obtained is sufficient and appropriate to provide a basis for our audit opinion on the balance sheet.

Basis for Disclaimer of Opinion on Results of Operations and Cash Flows

We did not observe the [redacted] as of December 31, 2013 because we were not engaged, and we have not obtained sufficient appropriate audit evidence about inventory quantities at that date by other auditing procedures. The amount of inventory at December 31, 2013, materially affects the determination of the results of operations and cash flows for the year ended December 31, 2014.

Disclaimer of Opinion on Results of Operations and Cash Flows

Because of the significance of the matter discussed in the Basis for Disclaimer of Opinion paragraph, we have not been able to obtain sufficient appropriate audit evidence to provide a basis for an audit opinion on the results of operations and cash flows for the year ended December 31, 2014. Accordingly, we do not express an opinion on the results of operations and cash flows for the year ended December 31, 2014.

Opinion on the Balance Sheet

In our opinion, the balance sheet referred to in the first paragraph presents fairly, in all material respects, the financial position of Chestnut Hill Tree Farm, LLC as of December 31, 2014, in accordance with accounting principles generally accepted in the United States of America.

Carr, Riggs & Ingram, L.L.C.

Gainesville, Florida
July 2, 2015

The accompanying footnotes are an integral part of these financial statements.

Chestnut Hill Tree Farm, LLC, is a Florida limited liability company. The company went through a conversion from a C-Corporation to LLC in 2005. The company is owned [redacted] Robert Wallace [redacted] and Deborah Gaw [redacted]

Robert D. Wallace – [redacted]
Deborah Gaw – [redacted]

Amended and Restated Operating Agreement
of
Chestnut Hill Tree Farm, L.L.C.

Amended and Restated Operating Agreement
of Chestnut Hill Tree Farm, L.L.C.,
a Florida Limited Liability Company

[redacted]

EXHIBIT A

CHESTNUT HILL TREE FARM, L.L.C.
SCHEDULE OF MEMBERS, CAPITAL CONTRIBUTIONS,
AND MEMBERSHIP UNITS

Member Name	Address	Initial Capital Contribution	Membership Units
Robert D. Wallace	15105 N.W. 94th Avenue Alachua, Florida 32615	$	[redacted]
Deborah A. Gaw	15105 N.W. 94th Avenue Alachua, Florida 32615	$	[redacted]
TOTALS		$	[redacted]

IN WITNESS WHEREOF, the parties hereto have executed this Agreement as of the date first above written.

Robert D. Wallace

Deborah A. Gaw

The company is currently and will remain [redacted] Robert D. Wallace and Deborah Gaw. [redacted]

Robert D. Wallace and Deborah Gaw[redacted] to CBD Equity, LLC [redacted] Jay Odom [redacted] of CBD Equity, LLC. [redacted]

[redacted]

[redacted]

Part 3.E.f. All subsidiaries of the Applicant

Not applicable

Part 3.E.g. Any other individuals or entities for which the Applicant is financially responsible

Not applicable

[redacted]

[redacted]

[redacted]

[redacted]

[redacted]

[redacted]

Part 3.E.j. Any pending lawsuits to which the Applicant is a party

Not applicable

Part 3.E.k. Any lawsuits within the past 7 years to which the Applicant was a party

Not applicable

Part 3.E.I. All financial obligations of Applicant that are not listed as a “liability” in the Certified Financials

The Applicant [redacted] from CBD Equity, LLC. Jay Odom is [redacted] of CBD equity. If approved for operation of a Low-THC Dispensing Organization, the Applicant, Chestnut Hill Tree Farm, LLC [redacted]

[redacted]

Chestnut Hill Tree Farm's financial projections were developed by its advisor, Jill Lamoureux. Lamoureux, previously a finance professional, has owned and operated several medical cannabis operations giving her in-depth knowledge of the financial requirements of the business model. [redacted] s.

The company used the Florida Revenue Estimating Conference[1] projections as a baseline for its projections. The assumptions contained in the State's projections were adjusted based on observational evidence from other new medical cannabis markets including Arizona, Connecticut, Massachusetts, and Illinois. The projections do not assume any legislative or regulatory changes. As a result the product demand estimates are fairly low; however, should patient adoption ramp-up faster than expected or new legislation impact demand, the company has sufficient land and cash on-hand to quickly build out additional capacity.

[redacted]

All of these adjustments provide a very conservative view of the company's financial position. As a result, the company [redacted]

The following operating budget reflects the projected revenues and expenses of the organization. [redacted]

[1] http://edr.state.fl.us/Content/conferences/revenueimpact/archives/2014/pdf/page656-667.pdf

Part 3.E.m. A projected two year budget for the Dispensing Organization

[redacted]

[redacted]

[redacted]

[redacted]

[redacted]

[redacted]

[redacted]

[redacted]

[redacted]

[redacted]

[redacted]

[redacted]

[redacted]

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[redacted]

[redacted]

[redacted]

[redacted]

[redacted]

[redacted]

CHESTNUT HILL TREE FARM, INC.

Projected Financials - Cannabis Operations
Cultivation, Processing/Manufacturing, & Dispensing

For the Four Years Ending
December 31, 2018

See notes to projected financial statements.

CONFIDENTIAL

[redacted]

See notes to projected financial statements.

CONFIDENTIAL

Part 3.E.n. Specific reference to sufficient assets available to support the Dispensing Organization activities.

Chestnut Hill Tree Farm [redacted] CBD Equity, LLC. [redacted] Jay Odom [redacted] CBD Equity, LLC. Odom's personal financial statements are attached [redacted]

Part 3.E.n. Specific reference to sufficient assets available to support the Dispensing Organization activities.

JAY ODOM
PERSONAL FINANCIAL STATEMENT
12/31/14

[redacted]

99 Eglin, Ltd.
Balance Sheet
December 31, 2014

[redacted]

99 Eglin, Ltd.
Income Statement
For the Period Ended December 31, 2014

99 Eglin, Ltd.
Income Statement
For the Period Ended December 31, 2014

[redacted]

Confidential: For Internal Use Only

American Eagle Diversified, LLC
Balance Sheet
December 31, 2014

[redacted]

American Eagle Diversified, LLC
Income Statement
For the Period Ended December 31, 2014

[redacted]

Confidential: For Internal Use Only

Anchors Street
Balance Sheet
December 31, 2014

[redacted]

Anchors Street
Balance Sheet
December 31, 2014

[redacted]

Anchors Street
Income Statement
For the Period Ended December 31, 2014

[redacted]

Avian Ventures, LLC
Balance Sheet
December 31, 2014

[redacted]

Avian Ventures, LLC
Income Statement
For the Period Ended December 31, 2014

[redacted]

Confidential: For Internal Use Only

B & J of Destin, Inc.
Balance Sheet
December 31, 2014

[redacted]

B & J of Destin, Inc.
Income Statement
For the Period Ended December 31, 2014

[redacted]

CBD of Destin
Balance Sheet
December 31, 2014

Assets

[redacted]

CBD of Destin
Balance Sheet
December 31, 2014

[redacted]

CBD of Destin

Income Statement

For the Period Ended December 31, 2014

Crestview Hangar #51 L.L.C.
Balance Sheet
December 31, 2014

Assets

[redacted]

Crestview Hangar #51 L.L.C.
Income Statement
For the Period Ended December 31, 2014

[redacted]

Confidential: For Internal Use Only

CBD of NWF
Balance Sheet
December 31, 2014

[redacted]

CBD of NWF

Income Statement

For the Period Ended December 31, 2014

[redacted]

CBD of NWF

Income Statement

For the Period Ended December 31, 2014

[redacted]

Destin Jet
General Ledger Balance Sheet Report
As Of: 12/31/2014
All Departments Consolidated

[redacted]

Destin Jet

General Ledger Standard Income Report

For The Period: 1/01/2014 Through: 12/31/2014

All Departments Consolidated

[redacted]

Destin Jet

General Ledger Standard Income Report

For The Period: 1/01/2014 Through: 12/31/2014

All Departments Consolidated

[redacted]

Regal Air Destin, LLC
General Ledger Balance Sheet Report
As Of: 12/31/2014
All Departments Consolidated

[redacted]

Regal Air Destin, LLC

General Ledger Standard Income Report

For The Period: 1/01/2014 Through: 12/31/2014

Regal Air Destin, LLC

General Ledger Standard Income Report

For The Period: 1/01/2014 Through: 12/31/2014

All Departments Consolidated

[redacted]

Regal Air Destin, LLC

General Ledger Standard Income Report

For The Period: 1/01/2014 Through: 12/31/2014

[redacted]

Freeport 860
Balance Sheet
December 31, 2014

[redacted]

Freeport 860

Balance Sheet

[redacted]

Freeport 860
Income Statement
For the Period Ended December 31, 2014

[redacted]

Freeport Communications, LLC
Balance Sheet
December 31, 2014

[redacted]

Confidential: For Internal Use Only

Freeport Communications, LLC
Income Statement
For the Period Ended December 31, 2014

[redacted]

Hammock Bay Building Co
Balance Sheet
December 31, 2014

[redacted]

Confidential: For Internal Use Only

Hammock Bay Building Co
Income Statement
For the Period Ended December 31, 2014

[redacted]

Confidential: For Internal Use Only

Hammock Bay Real Estate
Balance Sheet
December 31, 2014

[redacted]

Hammock Bay Real Estate

Income Statement

For the Period Ended December 31, 2014

[redacted]

The Jay Odom Group, LLC
Balance Sheet
December 31, 2014

[redacted]

The Jay Odom Group, LLC

Balance Sheet

[redacted]

The Jay Odom Group, LLC

Income Statement

For the Period Ended December 31, 2014

The Jay Odom Group, LLC
Income Statement
For the Period Ended December 31, 2014

[redacted]

Confidential: For Internal Use Only

JUD, LLC
Balance Sheet
December 31, 2014

[redacted]

JUD, LLC
Income Statement
For the Period Ended December 31, 2014

[redacted]

S. O. Investments, LLC
Balance Sheet
December 31, 2014

[redacted]

S. O. Investments, LLC
Income Statement
For the Period Ended December 31, 2014

[redacted]

Confidential: For Internal Use Only

Sterling Diversified
Balance Sheet
December 31, 2014

[redacted]

Sterling Diversified

Balance Sheet

[redacted]

Sterling Diversified
Income Statement
For the Period Ended December 31, 2014

[redacted]

Valiant Investment Properties, LLC
Balance Sheet
December 31, 2014

[redacted]

Valiant Investment Properties, LLC
Income Statement
For the Period Ended December 31, 2014

[redacted]

Waters Edge
Balance Sheet
December 31, 2014

[redacted]

Waters Edge

Income Statement

For the Period Ended December 31, 2014

[redacted]

Waters Edge
Income Statement
For the Period Ended December 31, 2014

[redacted]

Zeppelin Holdings, LLC
Balance Sheet
December 31, 2014

[redacted]

Zeppelin Holdings, LLC
Income Statement
For the Period Ended December 31, 2014

[redacted]

Confidential: For Internal Use Only

APPENDIX:
STANDARD OPERATING PROCEDURES

DRAFT

DRAFT

Policy Name	**Licensed Operations**
Policy Number	**TBD**
Date this Version Effective	**TBD**
Responsible for Content	**Cultivation Director**

I. Description

a. This Standard Operating Procedure describes the company's licensed operations.

II. Rationale/Purpose

a. It is corporate policy to maintain in good standing all necessary licenses required to operate.

III. Responsibilities

a. It is the responsibility of the Cultivation Director to ensure that all cultivation facilities are properly licensed for all activities within the unit.

IV. Policy and Procedure

a. Procedure
   i. The Chief Operating Officer shall maintain all required licenses in good standing.
   ii. The Cultivation Director shall not allow any activities to take place in the cultivation unit if they are aware that the license required for that activity is not valid, expired, or otherwise administratively
   iii. The Cultivation Director shall ensure current license certificates are on display in common areas.
   iv. No establishment of facilities or production capacity shall be implemented without proper approval from all regulating agencies.

V. Review/Revision

Date	Description of the Revision	Approved

DRAFT

DRAFT

Policy Name	**Building and Facility Requirements**
Policy Number	**TBD**
Date this Version Effective	**TBD**
Responsible for Content	**Director of Manufacturing**

I. Description

a. This Standard Operating Procedure describes the maintenance building and facility compliance.

II. Rationale/Purpose

a. It is corporate policy to properly identify and organize all building and facility locations used to manufacture and dispense its cannabis products in compliance with State of State department regulations.

III. Responsibilities

a. It is the responsibility of all employees to perform any manufacturing, packaging, testing, dispensing or other operations in only the locations designated by the company for that activity.
b. It is the responsibility of all company supervisors to ensure their facility operates in compliance with this SOP. They are also responsible for being aware of any problems, which prevent compliance with these SOPs and for recommending any required revisions or improvements.
c. It is the responsibility of the Chief Executive Officer to ensure all buildings and facilities used in the manufacture, processing, packing, holding or dispensing of cannabis products are of suitable size, construction and location to permit compliance with applicable state department regulations.

IV. Policy and Procedure

a. Policy
    i. The size and construction features of all buildings and facilities used in the manufacture, processing, packing, holding or dispensing of cannabis products shall be of suitable size, construction and location to facilitate cleaning, maintenance and proper operations. All buildings and facilities shall be maintained in good state of repair.
    ii. All buildings and facilities shall have adequate lighting and ventilation in all areas for their designated operations. Potable water shall be supplied under continuous positive pressure in a plumbing system free of defects that meet the standards prescribed in the Environmental Protection Agency's Primary Drinking Water Regulations. Drains shall be of adequate size and, where connected directly to a sewer, shall be designed to prevent back-siphonage.
    iii. Adequate washing facilities shall be provided, including hot and cold water, soap or detergent, air driers or single-service towels and clean toilet facilities easily accessible to working areas. All trash or other refuse in and from the building and immediate premises shall be disposed of in a timely, safe and sanitary manner.
    iv. These documents shall describe in sufficient detail:

DRAFT

1. Cleaning schedules, methods, equipment and materials to be used in cleaning the facility. Adequate records documenting these activities were performed according to their required schedule and written procedures shall be maintained.
2. Any rodenticides, insecticides, fungicides, fumigating agents and sanitizing agents shall be used in accordance with the Federal Insecticide, Fungicide and Rodenticide Act. Adequate records documenting the frequency and methods utilized for these activities shall be maintained.

V. Review/Revision

Date	Description of the Revision	Approved

DRAFT

Policy Name	**Equipment Design and Maintenance**
Policy Number	**TBD**
Date this Version Effective	**TBD**
Responsible for Content	**Manufacturing Director**

I. Description

a. This Standard Operating Procedure describes the maintenance procedures and proper design for all equipment used in operations.
b. The company shall ensure equipment properly maintained and designed to allow for sufficient and efficiency to prevent alteration contamination.

II. Rationale/Purpose

a. It is corporate policy to only utilize equipment for the manufacturing, processing, packaging or holding product of appropriate design, adequate size and suitably located within the facility for its intended use, cleaning and maintenance.

III. Responsibilities

a. The Quality Assurance Officer will oversee policy compliance for personnel under his or her supervision.
b. It is the responsibility of all company personnel to only utilize equipment for its designated manufacturing, processing, packaging or holding purposes.
c. It is the responsibility of each department's assigned personnel product to properly maintain all equipment utilized for the manufacturing, processing, packaging or holding of company products.
d. It is the responsibility of the Manufacturing Director to oversee and ensure compliance with this Standard Operating Procedure.

IV. Policy and Procedure

a. Policy
    i. Equipment shall be constructed so surfaces that contact the components, in-process materials or products shall not be reactive, additive or absorptive and alter the safety, identity, strength, quality or purity of any cannabis product beyond its established specifications.
    ii. Substances required for operation, such as lubricants, shall not come into contact with product components, packaging, in-process materials or finished products and alter the safety, identity, strength, quality or purity of the cannabis product beyond its established specifications.
    iii. Equipment shall be maintained and sanitized at appropriate intervals to prevent malfunctions or contamination that would alter the safety, identity, strength, quality or purity of the cannabis product beyond its established specifications.
    iv. Written programs shall be established and followed for the maintenance of equipment used in the manufacture, processing, packing or holding of all products. These written procedures, schedules and logbooks shall include:
        1. Assignment of responsibility for maintaining the equipment
        2. Maintenance schedules, including, where appropriate, sanitizing schedules

DRAFT

3. A description in sufficient detail of the methods, equipment and materials used in the maintenance operations

4. All major pieces of equipment will be uniquely identified and have a dedicated equipment maintenance log.

5. Written records of the equipment maintenance (except for routine in-process adjustments) shall include the date, time and identification of the previous product and lot number processed with that equipment.

6. The person performing equipment maintenance shall date and sign or initial the log indicating that the work was performed. Entries in the log shall be in chronological order.

7. Automatic, mechanical or electronic equipment shall be routinely calibrated, inspected or checked according to a written program designed to assure proper performance. Written records of those calibration checks and inspections shall be maintained.

v. Any equipment record that is required to be maintained in compliance with this procedure shall be retained for at least five years after distribution of the product manufactured, processed or packaged utilizing that equipment.

vi. Filters for liquid filtration used in the manufacture, processing or packaging shall be of adequate design for their intended purpose. Use of an asbestos-containing filter is prohibited.

vii. Appropriate controls shall be exercised over computer or related systems to assure that any changes in master production control records or similar documentation are instituted by authorized personnel. Input to and output from the computer or related system of formulas or other product manufacturing data shall be checked for accuracy. The degree and frequency of input/output verification shall be based on the complexity and reliability of the computer or related systems. Accurate backup records entered into computer system shall be maintained.

V. Review/Revision

Date	Description of the Revision	Approved

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Appendix A
Organizational Chart

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Appendix B
Floor Plan

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