

TREE KING-TREE FARM, INC.

NORTHWEST REGION

REDACTED COPY

KEY EXECUTIVES

Shannon Rosier – CEO

Dr. Stephen Duncan, MD – Medical Director

Sam Ard, Ard, Shirley & Rudolph, P. A. – Legal Counsel

Gerrard L'Heureux – Nursery Owner

Devoe Moore – Investor / Financial Advisor

Baxter Troutman (grandson of Ben Hill Griffin, Jr) – Investor / Financial Advisor

Gary Hennen – Nurseryman

Billy Pope – Master Grower

Meg Sanders, CEO of Be Mindful, Inc. – Cultivation/Processing Manager

William Rubin – Government Relations

Mission Statement

When our group of North Florida business professionals formed, we had a single thought in mind, to help those in need of a better medication to ease their suffering. We each had our lives touched by friends, relatives or colleagues who were suffering from uncontrolled seizures or chemo therapy/cancer-related pain. This common goal bonded us and placed us on a mission.

This venture started more than two years ago and, after many long hours, we have forged together what we believe is an expert panel of professionals in Medicine, Law, Finance, Horticulture, Manufacturing, Nursery and Cannabis Cultivation. Since the cannabis industry was not present in Florida, we did reach out to experts in that area who are currently operating in 17 states and have the most proven track record in the industry as far as production, innovation and purity is concerned. The Mindful Group, along with two native Floridians with extensive knowledge and expertise in the nursery business acting as our expert grower and nursery supervisor, respectively, having a combined 65 years of experience and multiple awards, have joined us. This group comprises what is the perfect combination of skill, knowledge, professionalism and desire to produce a superior product for those in need in our state.

Advisory Board

Erik Williams - Be Mindful, Government Relations

Shannon Rosier - CEO

Dr. Stephen Duncan - MD

Gerald L'Heureux - Tree King Tree Farm, Inc.

Gary Hennen - Olgesby Plants International

DeVoe Moore -- Investor

Baxter Troutman -- Investor (Grandson of Ben Hill Griffin)

William Rubin -- Governmental Advisor

Dr. George Arcos -- Anesthesiologist and Pain Management Doctor

Dr. Kirk Mauro -- Rehab Specialist

Carl Goodman -- FAMU Pharmacy

David Welch -- CA Cannabis Attorney

Michael O'Neil -- Former CIA Attorney

Daryl Parks -- Tallahassee Attorney

Barbara Clements -- Certified Financial Planner

Dr. Billy Close -- FSU Criminology Dept.

Columbus Smith -- Member Black Farmers of America

Michelle Leigh Carter -- Senior Chemist

SHANNON ROSIER, CEO

Shannon Rosier is a wife and mother of 4 children. She grew up in Sarasota, FL and came to Tallahassee in 1992 for her college career. She has owned and operated a Certified Public Accounting Firm since 2004. Her career began in 1993 when she got her 1st job as a Tax Receptionist. From there Shannon continued her education changing directions from Law to Accounting, and began working from the bottom up. Shannon became a Florida Notary in 2002 and still holds that title. While attending classes at Tallahassee Community College and Florida State University, she became a Certified Bookkeeper, then successfully passed the IRS Enrolled Agents exam (tax expert) before finishing her required courses for the CPA exam through The University of Phoenix. In 2014 she became a Certified Forensic Accountant and works directly with all Law Enforcement agencies pertaining to financial crimes.

Shannon spent 4 years working with the National Republican Party, working on the Campaigns of Bush & Chaney, Rudy Giuliani, Fred Thompson and the Bush Law Library. She has worked with many Non-Profits as the Project Manager and Administrator, starting Coalitions and performing Grant Management services. Shannon was inducted as an honorary member of the FAMU Gamma Mu Lambda Chapter of Alpha Phi Alpha Fraternity, Inc. and the FSU Phi Gamma Delta Fraternity (Fiji) for her years of dedicated service to both organizations. She led multiple fund-raising events that provided scholarships to thousands of low-income students, working through the Alpha Educational and Leadership Foundation, Inc.

Shannon has been a year-round volunteer Head Coach for the YMCA and the City of Tallahassee youth sports programs for over 13 years. Her children attended Florida State University K-12 School. Her oldest daughter Chelsey Rosier(21) attends Texas A & M University on a women's basketball scholarship, her son Malik Rosier(19) attends the University of Miami on a football scholarship (QB) and plays baseball, her second daughter Taylor Rosier(18) has accepted a softball scholarship at Florida A & M University and her last daughter, Jordan Rosier(12), attends Florida High School starting the 7th grade as an honor student.

Shannon also finds time to serve as the Director of North Florida Elite Girls Basketball program, which trains and prepares Regional female basketball athletes for an Elite level of NCAA competition from March through August that secures scholarships to many girls that wouldn't have the opportunity otherwise. She has helped facilitate 23 female scholarships over the past 3 years. She works with the recruiting departments of USA Basketball, ACC, SEC, Big 10 and many other collegiate conferences. She also is the Assistant Director of Women's Basketball Camp at Ohio State University, Louisville, South Carolina, Florida State and University of Miami every summer.

William D. Rubin, [REDACTED]



As president of The Rubin Group, William Rubin represents clients before the Florida Senate, the Florida House of Representatives, the Governor and the Florida Cabinet, as well as Florida's various state agencies.

His practice also includes representing clients before local governments throughout South Florida. In addition to lobbying, Rubin serves as a key advisor to many large companies, with a focus on advising health care companies in Florida, including helping get early-stage companies off the ground. In addition, Rubin's extensive experience in the strategy and management of statewide and local campaigns has been a valuable asset to numerous candidates and public officials.

Prior to founding The Rubin Group, Rubin had a distinguished record of accomplishment in both the public and private sectors. He began his career working for Florida's Attorney General as an executive assistant and later joined the Florida Department of Insurance, where he rose to the position of assistant insurance commissioner and treasurer. Throughout his tenure with the Department of Insurance, he was active with the National Association of Insurance Commissioners and the National Association of State Treasurers.

As assistant commissioner, he was directly responsible for all activities related to the Florida State Board of Administration, the agency that manages the investments for Florida's pension funds. In addition, he served as the department's chief legislative lobbyist overseeing the department's legislative agenda. Additionally, Rubin is the former Chairman of the Pompano Farmers Market Authority and has served as a board member for the Story Theatre, a not-for-profit corporation helping to introduce underprivileged young people to live theater. Rubin also currently serves on the State Board of the Ounce of Prevention. Rubin received his Bachelor of Science degree in Journalism from the University of Florida, where he was inducted into the University of Florida Hall of Fame and Florida Blue Key; and, he currently resides in Broward County, Fla., with his wife Lys and daughter Michelle.



DeVoe Moore found his love for collecting when he started his first knife collection at the age of 9. (He's still collecting!) This love quickly grew to include cars. During his Junior year of high school, he customized his brother's 1951 Ford two-door hardtop. While still in high school he had a 1933 Ford Coupe chopped and channeled with an Oldsmobile motor. This car would "outrun anything" in Tampa, Florida. Then came a 1953 Mercury Monterey two-door hardtop. He and three of his high school buddies rolled this car smashing the top down against the seats. These acquisitions and activities were just the start of a lifelong passion for the craftsmanship seen in automobiles and other collections he has assembled. A furtherance of this passion is to ensure the children of today have an opportunity to visit the past, to be excited and amazed at their own history and potential.

Born in Spring Creek, North Carolina in 1939, DeVoe Moore spent his early childhood in Greeneville, Tennessee prior to moving to Tampa, Florida where he graduated high school. His formal education started at Andrew College in Cuthbert, Georgia and was completed at Florida State University in Tallahassee, Florida. DeVoe is married to Shirley McEwan. They have two daughters and six grandchildren. He has made Tallahassee his home since 1961.

DeVoe has been involved in numerous land acquisitions and has been self-employed with various businesses over the years. Some of his businesses have included Fleet Supply, Inc., Florida Georgia White Truck Sales, ABAC Auto Parts, Baker Alford Auto Parts, Certified Automotive Warehouse, Airport Industrial Park, Fort Knox Storage, Cross Creek Golf Course and the Tallahassee Automobile Museum. Through the years, he has served and continues to serve the local community through his involvement in his church and many different organizations. He also serves as a board member of several community foundations and has been honored in a variety of ways by various organizations.

Some of the most recent honors include, helping to establish the DeVoe L. Moore Center in the College of Social Sciences in 1996. The Center's purpose is to help students study how government rules and regulations affect free enterprise and property rights. He has also provided numerous endowed scholarships to assist athletes and other students.

In 2005, he received an Honorary Doctor of Humane Letters Degree from Florida State University as recognition of his personal achievements and his generosity toward generations of young people seeking a higher education.

In 2009, the East Coast Drag Times Hall of Fame inducted DeVoe into the prestigious group of people who participate in motorsports racing. He was honored for his contribution to the motorsports heritage through the museum.

In 2010, DeVoe was honored to have the University Center building named after him as part of the expansion of Doak Campbell Stadium at Florida State University.

In 2012, DeVoe was inducted into the Florida State University Athletic Hall of Fame for his gracious contribution to the University and Athletic Department, inspiring others to do the same.

In DeVoe's spare time he enjoys working his farm which includes water buffalo and goats, working his pastureland, and speaking to community groups and associations about free enterprise and the museum. In addition to these interests, DeVoe's businesses could certainly be considered 'hobbies' to him.



Baxter Troutman is a fourth generation Floridian. He grew up in an agribusiness family whose focus was primarily citrus and cattle ranching. He is the grandson of Ben Hill Griffin, Jr.

After graduating from college he spent several years working in the family's foodservice juice and beverage sales division. In 1997 he founded Labor Solutions, Inc. a staffing agency which he still owns and operates today. In 2002 he was elected to the Florida House of Representatives for an eight year term where he served on numerous committees while focusing on insurance reform, business/economic development and agricultural issues. He was chairman of the Agriculture and Natural Resources committee from '08-'10. During his time in the legislature he received numerous industry and leadership awards for his service to the State and to various industries.

Since his term in the legislature, he has served on several Boards including Farm Credit of Florida, Winter Haven Economic Development Committee and Webber College. Baxter is also an active member of Vistage International a CEO peer group. He recently purchased Dark Hammock Legacy Ranch, a 5000 acre working cattle ranch. He is active in his church and is a participant in the University of Florida's Wedgworth Leadership Program. Baxter along with his wife and daughter make their home in Winter Haven, FL.



Our General Counsel and Director of Governmental Affairs is Samuel Ard, senior partner in the Tallahassee law firm of Ard, Shirley & Rudolph P.A. They are an AV-rated law firm consisting of three lawyers who practice regularly before a variety of state and local governmental entities, as well as in state and federal courts.

Ard, Shirley & Rudolph has extensive experience representing both public and private interests on issues such as: labor/employment, corporate governance, civil business litigation, and contract law. Ard, Shirley & Rudolph's governmental affairs practice includes monitoring legislation affecting existing state law, lobbying to prevent changes detrimental to clients, and supporting legislation benefiting its clients. In addition, the governmental affairs practice includes representation before state agencies and the Florida Governor and Cabinet on relevant matters.

While multi-office mega-firms fulfill a much needed role in today's legal market, Ard, Shirley & Rudolph is a focused, efficient law firm that has retained an emphasis on a high level of service, offering its clients the benefits of avoiding institutional inertia and the inflated expenses associated with larger sized firms.

After growing up and working in his family's agricultural business in rural Jay, Florida in Santa Rosa County, Sam graduated with an AA degree from Pensacola Jr. College in 1979, and Florida State University with a BA in Government in 1981. In 1986, Sam received his law degree from the Florida State University College of Law.

He served in a variety of political internships while in undergraduate studies, and was hired as a legislative aide upon graduation. While in law school he served as Chief Justice of the FSU Honor Court, clerked with the Tallahassee law firm of Roberts, Baggett, LaFace & Richards, was selected to intern for the Speaker's Office of the Florida House of Representatives, and was employed as an analyst for the State Comprehensive Plan Committee.

Upon graduation from law school Sam was hired as Director of Governmental Affairs for the St. Joe Paper Company, managing the governmental relations among its two railroads, 15 box-manufacturing plants, three telephone companies, a sugar mill and paper mill, and over one-million acres of Florida land. He left St. Joe in 1994 when they began to diversify to begin his career in law, and has been in private practice since 1995.

Sam has served as President of the Florida 4-H Foundation, and former Board member of Farm Share and the Theodore Roosevelt Society. He has served as Chairman of the Florida Agricultural Coalition, comprised of twenty-five Florida agricultural entities and associations. He was also appointed by then Agriculture Commissioner Charlie Bronson to serve on the Forestry Best Management Practice Committee, and has since worked with the Department and the Florida Wildlife Commission to implement Wildlife BMPs. He has also served on the vestry of St. Peter's Anglican Church in Tallahassee.

He directs governmental affairs activities for the Firm and its clients, and has extensive lobbying experience at the local, state, and federal levels. Sam's practice of law includes negotiating conservation easements over agricultural lands, new corporation creation and organization, environmental permitting, ad valorem tax and sales tax issues, and probate and estate issues.

Biographies

Dr. Stephen Duncan – Medical Director

Dr. Duncan completed his residency in OB/GYN at Mercer University. Dr. Duncan began his career by practicing high risk Obstetrics and delivering at both Tallahassee Memorial Hospital and Capital Regional Medical Center. He served on the surgical review committee as an expert advisor on surgical protocol in all Obstetrical and Gynecological surgeries and in case review for risk management. Dr. Duncan also served as the OB/GYN for Florida State Hospital managing all inpatient and outpatient gynecological and obstetrical services. He was the Medical Director for Total Home Care, a compounding pharmacy, where he was instrumental in the research and development of multiple medications on the market today. His practice is currently focused on Gynecology, Bio-Identical Hormone Replacement Therapy, health maintenance and pain management

Gerard L'Heureux – Nursery Owner, Tree King Tree Farm, Inc.

Gerard L'Heureux was born December 17, 1942 in Detroit, Michigan. He is a USAF veteran who is married with two children. After the service, he began work for General Motors Institute where he gained management experience. He has a degree in Industrial Management. He has worked at Tree King Tree Farm, Inc., to become familiar with all facets of nursery business from seed to market. He has become instrumental in projects with Disney World in regards to development of trees for Florida's environment, as well as in Pasco County, FL.

Billy Pope - CEO, Organic Coco, Inc.

As a Master Grower with over 40 years of experience in growing, cultivating, processing and dispensing cannabis in California, Billy Pope and his team of master growers have the knowledge, skills and capability to design, build, operate and maintain a state of the art Cannabis grow and dispensary in the emerging Medical Marijuana Industry in my home state of Florida. Billy has 2 major indoor dispensaries in Los Angeles and one large outdoor grow in northern CA. He opened the first dispensary in Los Angeles and has been a leader in the California cannabis industry. In addition, he was a pioneer in the utilization of Coco Coir used as an organic medium to grow cannabis. It is now the standard in the industry. Billy owns the company that imports the medium. His plan is to utilize most of the techniques he has used successfully in California.

DeVoe Moore – Investor

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After graduating from college he spent several years working in the family's foodservice juice and beverage sales division. In 1997 he founded Labor Solutions, Inc. a staffing agency which he still owns and operates today. In 2002 he was elected to the Florida House of Representatives for an eight year term where he served on numerous committees while focusing on insurance reform, business/economic development and agricultural issues. He was chairman of the Agriculture and Natural Resources committee from '08-'10. During his time in the legislature he received numerous industry and leadership awards for his service to the State and to various industries.

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William Rubin – Governmental Advisor

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Dr. George Arcos – Anesthesiologist and Pain Management

Board certified in anesthesiology with added qualification in pain medicine by the American Osteopathic Board of Anesthesiology, Dr. Arcos is one of the region's most experienced interventional pain physicians, with over twenty-five years of experience in the field. He received his undergraduate degree from the University of Florida in Gainesville, FL and his medical degree from the New York College of Osteopathic Medicine in Old Westbury, NY. He has medical licensure in Florida and Georgia, currently working at the Florida Pain Institute in Merritt Island, FL.

Dr. Kirk Mauro – Physical Medicine and Rehabilitation

Dr. Mauro received his undergraduate and medical degrees from the University of Pittsburgh. He is Board Certified in Physical Medicine and Rehabilitation and has been a member of The American Academy of Electrodiagnostic Medicine for the past the past 17 years. Dr Mauro's understanding of EDX Medicine for differential diagnosis, treatment planning and the potential aftermath of "misdiagnosis" in patient care makes him unique and a valued asset. Dr. Mauro holds certifications from the American Board of Independent Medical Examiners and the Academy of Disability Evaluating Physicians.

Daryl Parks – Tallahassee Attorney

Daryl D. Parks's undergraduate degree was in both economics and political science. Both degrees have served him well as a successful attorney. His success as a lawyer and business man can be simply described: Advocate for the least of these. To that end, Parks and his firm enjoy a national reputation for their firm's strength and success because of the firm's commitment to diversity in its workforce and commitment to the community. As an attorney, Daryl Parks and his law firm, Parks and Crump, L.L.C., have distinguished themselves as successful litigators and masterful courtroom attorneys. Parks' doggedness to protect and defend his clients' best interests has gained Daryl Parks great notoriety and appearances on national television broadcasts to include MSNBC, Fox News, CNN, and Dr. Phil. Finally, Parks philanthropy and civic engagement is also very uncommon and represents his uncommon willingness to make a difference in the lives of others both here and abroad. Daryl Parks has an uncommon interest in improving the lives of the people in Africa by making both a personal and financial investment in improving the educational options found on the continent. Parks also partners with other persons of goodwill by sponsoring medical mission trips that include medical providers and supplies.

Barbara Clements – Certified Financial Planner

Barbara H. Clements is a principal of Clements Financial Services, Inc. where she handles investment accounts for individuals, estates and trusts. She began her financial career as an auditor for the Internal Revenue Service prior to entering the private sector and then becoming a Certified Financial Planner. Ms. Clements served on numerous local boards such as: North East Business Association, the Tallahassee Housing Foundation and Farmers and Merchants' Business Advisory Board. Barbara attended the University of Georgia and received a Master's Degree from Louisiana State University. Ms. Clements has been providing financial planning and investment services for her clients since 2000. She also serves as a mentor and Chapter Director for other investment advisors in the panhandle.

Michelle Leigh Carter – Senior Chemist, ADPEN Laboratories, Inc.

Michelle Leigh Carter has a Master of Science in Chemistry from the University of North Carolina at Wilmington, NC. She has a Bachelor of Science in both Chemistry and Biology from the Wilmington College in Wilmington, OH. At ADPEN Laboratories, Inc., she serves as Study Director and/or Principal Investigator on analytical projects, method validation, method transfer, quality control on research and developmental studies, including residue chemistry, magnitude of the residue and environmental fate. Supervisory, data analysis and compilation, and a hands-on approach with instrumentation and client coordination are among her other attributes at this position.

PART I

Northwest Compassionate Care, Inc

Application for Low-THC Cannabis Dispensing Organization

Application Type: Initial Application Renewal Application

Dispensing Region: Northwest Northeast Central Southwest Southeast

Nursery:

Name: Tree-King Tree Farm, Inc.

(Unless an individual, the organization name must be registered with the Department of State)

DACS Certificate Address: 4903 State Road 54 New Port Richey, FL 34652-5902

Mailing Address (if different): P.O. Box 12158 Tallahassee, FL 32317

Physical Address (if different): 1633 High Bridge Road Quincy, FL 32351

Phone Number: 850-877-3575

E-mail Address shannon@rosierco.com

Nurseryman:

Operating Nurseryman: Gary Hennen

Mailing Address: 15168 NW Oglesby Road Altha, FL 32421

Phone Number: 850-762-3229

E-mail Address: garyh@oglesbytc.com

Medical Director:

Name: Stephen W. Duncan, MD

Mailing Address: 2056 Centre Pointe Lane Tallahassee FL, 32308

Phone Number: 850-325-1212

E-mail Address: stephenduncanmd@yahoo.com

License Number: ME83619

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

ISSUED TO:

TREE-KING TREE FARM, INC.
 L'HEUREUX, GERARD
 4903 STATE ROAD 54
 NEW PORT RICHEY, FL 34652-5902

THIS CERTIFICATE EXPIRES: 05/22/2016

FEE PAID: \$460.00

REGISTRATION NO.: 04716782

DATE ISSUED: 05/08/2015

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.

A handwritten signature in black ink, appearing to read "Adam H. Putnam".

ADAM H PUTNAM
 Commissioner of Agriculture

Florida Department of Agriculture and Consumer Services
Division of Plant Industry

NURSERY, STOCK DEALER AND SPECIAL INSPECTION REPORT

H. PUTNAM
COMMISSIONER

Section 581.031 (15)(a)(18), F.S. / Rule 58-2.010, F.A.C.

1911 S.W. 34th St / P.O. Box 147100 Gainesville, FL 32614-7100
Phone: (352) 395-4700 / Fax (352) 395-4619

FOR DPS USE ONLY

NEW LOCATION CH RISK TO
 OB FIRM CH DPS TC
 OB LOCATION QUARANT
 CHANGE/UPDATE NAME
 MAILING ADDRESS LOCATION

DATE: 7/7/15

NURSERY () STOCK DEALER () SPECIAL INSPECTION () WFLA-TV
 STOCK DEALER INVENTORY OF 5000 OR MORE PLANTS () GARDEN CENTER
 REGISTRATION NUMBER: 4716252 BLOCK/OUTLET NUMBER: _____
 NUMBER OF INSPECTIONS: 1 EXPIRATION DATE: _____ COUNTY: Collier
 NAME: Tree - Nurture Florida, Inc.
 MAILING ADDRESS: 4703 S.W. 11th Ave, Ft. Myers, FL 33907
 PHYSICAL LOCATION: 1632 Hwy. 90, Collier, FL 34131

- FORMERLY:
1. Nursery stock passes inspection and meets certificate requirements.
 2. Nursery stock listed below was found infested or infected with plant pests needing immediate attention.

INFESTED OR INFECTED NURSERY STOCK

Name of Plant	Plant Pest	Location in Establishment

3. Verbal Enforcement Action/See Remarks Section.
4. Stop Sale/Report of Violation issued.
5. Nursery stock listed below is to be held until further notice and cannot be moved due to plant pests or other reason specified for possible quarantine action.

QUARANTINE ACTION: NEW CONTINUE RELEASE DESTROY GRASS & WEED

NUMBER OF PLANTS	ACRES	PLANT NAME	PEST	LOCATION OF QUARANTINED PLANTS IN NURSERY

SPECIAL INSPECTIONS

OTHER THAN NURSERY STOCK	NUMBER OF PLANTS	NUMBER OF ACRES	NO. INSPECTIONS

REMARKS: NEW STOCK

REPORT RECEIVED BY: _____ PLANT PROTECTION SPECIALIST
 (Owner, Manager, Person in Charge)
 _____ (Print Name)
 DISTRICT NUMBER: _____
 District Office Phone #: _____

Florida Department of Agriculture and Consumer
Services

Division of Marketing and Development
Mayo Building M-38
Tallahassee, Florida 32308

69652

Business Mailing Address:

TREE KING-TREE FARM, INC.
DBA: TREE KING TREE FARM, INC.
4903 STATE ROAD 54
NEW PORT RICHEY, FL 34652-5902

Location Address:

TREE KING TREE FARM, INC.
18625 RUSTIC WOODS TRL
ODESSA, FL 33556-5227

Your official license appears below. This license should be detached along the dotted line and posted in a conspicuous area at your place of business, along with any other permits issued by this department.

Cut Here



POST LICENSE
CONSPICUOUSLY

State of Florida
Department of Agriculture and Consumer Services

Division of Marketing and Development/Bureau of Agricultural Dealer's Licenses
850-617-7150
Tallahassee, Florida

Issue Date: 04/29/2015

Fee Amt Paid: \$270

FEIN: 59-2846334

Effective Date: 04/17/2015

License as Dealer in Agriculture Products
GOOD FOR ONE LOCATION

This license is issued under authority of Section 604.15-604.34, Florida Statutes, to:

License # 69652 -
TREE KING-TREE FARM, INC.
DBA: TREE KING TREE FARM, INC.
18625 RUSTIC WOODS TRL
ODESSA, FL 33556-5227

Commodity Code: 1
Bonding Company: WESTERN SURETY COMPANY
Bond Amount: \$5,000 Bond effective from 04/17/2015 through 04/16/2016

Field Representatives MARK MORITZ

ADAM H. PUTNAM
COMMISSIONER OF AGRICULTURE

This is to certify that the dealer in agricultural products whose name and address are shown above, has paid the required fee and has made an approved surety bond to the Commissioner of Agriculture as required by Sections 604.15-604.34, Florida Statutes, and is hereby granted this license as Dealer in Agricultural Products as defined in Section 604.15, Florida Statutes. This license is for a one year period.

FDACS-16069 05/14

PART II

Northwest Compassionate Care, Inc

Application for Low-THC Cannabis Dispensing Organization

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

Attachment: Part II A 1.jpg

2. Operation as a nursery in this state for at least 30 continuous years.

Attachment: Part II A 2.jpg

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.

Attachment Part II B 1 GL.jpg

Attachment: Part II B 1 SD.jpg

Attachment Part II B 1 SR.jpg

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.

- Gerald L'Heureux – February 18, 2015
- Stephen W. Duncan MD – July 7, 2015
- Shannon Rosier – June 30, 2015

DIVISION OF PLANT INDUSTRY
(352) 395-4700



POST OFFICE BOX 147100
GAINESVILLE, FLORIDA 32614-7100

1911 S.W. 34TH STREET
GAINESVILLE, FLORIDA 32608

FLORIDA DEPARTMENT OF AGRICULTURE AND CONSUMER SERVICES
COMMISSIONER ADAM H. PUTNAM

July 8, 2015

Tree-King Tree Farm, Inc.
Gerard L'Heureux
4903 State Road 54
New Port Richey, FL 34652-5902

Dear Mr. L'Heureaux,

Per your request, please find attached a copy of your current Certificate of Nursery Registration. According to the Department's records, your nursery has operated as a registered nursery since prior to 1984 and has a current inventory of 2,775,288 plants. The plant inventory is also reflected on your Certificate of Nursery Registration in the form of the registration fee amount as provided in the fee schedule adopted in Rule 5B-2.002, Florida Administrative Code.

Sincerely,

A handwritten signature in black ink that reads "Tyson R. Emery".

Tyson R Emery
Bureau Chief, Plant and Apiary Inspection

A large, bold, handwritten text "PART II A1" in black ink, positioned on a light-colored, textured background.

FLORIDA DEPARTMENT OF STATE
DIVISION OF CORPORATIONS**Detail by Entity Name****Florida Profit Corporation**

TREE KING-TREE FARM, INC.

Filing Information

Document Number	K64924
FEI/EIN Number	592945334
Date Filed	02/10/1989
State	FL
Status	ACTIVE
Last Event	CANCEL ADM DISS/REV
Event Date Filed	10/13/2003
Event Effective Date	NONE

Principal AddressS
NEW PORT RICHEY, FL 34652

Changed: 01/04/2012

Mailing Address4903 ST RD 54
NEW PORT RICHEY, FL 34652

Changed: 10/07/2004

Registered Agent Name & AddressL'HEUREUX, GERARD
4903 ST RD 54
NEW PORT RICHEY, FL 34652

Name Changed: 02/07/2002

Address Changed: 02/07/2002

Officer/Director Detail**Name & Address**

Title P

L'HEUREUX, MICHAEL
4903 ST RD 54
NEW PORT RICHEY, FL 34652

A rectangular area with a grainy, textured background containing the handwritten text "PART 11A2" in a bold, black, sans-serif font.

Title V

L'HEUREUX, GERARD
4903 ST RD 54
NEW PORT RICHEY, FL 34652



Annual Reports

Report Year	Filed Date
2013	03/21/2013
2014	04/30/2014
2015	04/24/2015

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State of Florida, Department of State

Mission:

To protect, promote & improve the health of all people in Florida through integrated state, county & community efforts.



Rick Scott
Governor

John H. Armstrong, MD, FACS
State Surgeon General & Secretary

Vision: To be the Healthiest State in the Nation

February 18, 2015

PERSONAL AND CONFIDENTIAL

Gerard Lheureux
4903 State Road 54
New Port Richey, FL 34852

In re:

Dear Mr. Lheureux:

Sincerely,

Patricia Nelson, Director
Office of Compassionate Use

PART II B1 GL

Mission:

To protect, promote & improve the health of all people in Florida through integrated state, county & community efforts.



Rick Scott
Governor

John H. Armstrong, MD, FACS
State Surgeon General & Secretary

Vision: To be the Healthiest State in the Nation

July 7, 2015

By hand delivery 7/15/15
PERSONAL AND CONFIDENTIAL

Stephen W. Duncan
2056 Centre Pointe Lane
Tallahassee, FL 32308

In re:

Dear Dr. Duncan:

Sincerely,

Patricia Nelson, Director
Office of Compassionate Use

PART II B1 SD

Mission:

To protect, promote & improve the health of all people in Florida through integrated state, county & community efforts.



Rick Scott
Governor

John H. Armstrong, MD, FACS
State Surgeon General & Secretary

Vision: To be the Healthiest State in the Nation

June 30, 2015

PERSONAL AND CONFIDENTIAL

Shannon Lynn Rosier
1717 Valley Road
Tallahassee, FL 32301

In re:

Dear Ms. Rosier:

Sincerely,

A handwritten signature in black ink, appearing to read "Patricia Nelson". The signature is fluid and cursive, written over a light background.

Patricia Nelson, Director
Office of Compassionate Use

PN/jb

PART III

Northwest Compassionate Care, Inc.

Application for Low-THC Cannabis Dispensing Organization

Northwest Compassionate Care, Inc. (herein after referred to as “NWCC”) in coordination with Tree-King Tree Farm, Inc. (hereinafter referred to as “TK”) a qualified nursery as defined by F.S. Section 381.986(5)(b)1 was created for the purpose of growing, manufacturing, selling, delivering, transporting, distributing and dispensing high quality derivative products of marijuana for medicinal use in the State of Florida.

In order to provide dependable, high-quality derivative products of marijuana to patients in Florida the NWCC is teaming up with several experts including: Be Mindful, a recognized industry leader in Colorado with more than five years experience designing and implementing a successful operational plan, growing, harvesting, extracting and dispensing marijuana. Billy Pope, a Master Grower for over 40 years, the CEO of Organic Coco, Inc. and Gary Hennen our designated “Nurseryman”, to provide guidance and expertise in cultivating, processing, packaging and distribution of medical cannabis.

A. Cultivation

I. Technical Ability

a. Experience cultivating cannabis

Since its founding five years ago, Be Mindful has provided a steady, uninterrupted supply of medical marijuana products to registered dispensaries in its home state of Colorado, including four Be Mindful dispensaries located across the state. With an exemplary record of compliance and safety, Be Mindful has earned the respect and trust of government, physicians and patients alike.

b. Experience cultivating in Florida plants not native to Florida

NWCC’s Nurseryman has extensive experience growing non-native plants. His current experience of producing over 125 varieties, only 5 plants could be considered “native” to Florida using a very liberal definition of the term native. With few exceptions, the entire nursery industry of Florida mostly grows non-native plants. Through out history, the vast majority of plants grown and offered in Florida are considered non-native or exotic.

Several of these non-native plants are similar to cannabis which makes experience with these non-native plants invaluable. The techniques employed are similar to nurseries in California and Colorado growing cannabis and to adopt those practices and apply them to Florida, along with the vast experience in growing non-native and exotic plants, will make NWCC unmatched in Florida or the U.S.

c. Experience introducing new varieties of plants

NWCC's nurseryman has extensive experience introducing new plant varieties to the ornament plant industry. Since the mid 1980's the nurseryman has maintained one of the worlds' largest breeding programs for tropical ornamental plants. Utilizing sexual, mutation and selection breeding techniques, he has introduced over 150 new plant varieties to the ornament industry.

With the nurseryman's experience covering one of the broadest ranges of new varieties of plants of any nursery in the south east, NWCC has the ability to take known grow cycles and seasonal variations that are innate to Florida's climate and apply them to these new varieties of plants. Knowing the classes of vegetation and how genetically similar plants thrive gives NWCC great insight to the future success with each new variety of plant.

d. Regional cultivation knowledge and experience

NWCC's Nurseryman has successfully grown plants indoors and outdoors in Northern Florida using both field growing and greenhouses. The Nurseryman has experience growing numerous plant types including annuals, perennials, woody ornamentals and indoor tropical plants and is very familiar with regional climate and weather.

Given the fact that the NWCC team has both indoor and outdoor cultivation sites that have proven successful speaks to our expertise in these areas. As anyone from the Northwest Florida area knows, the climate here is unique compared to the rest of the state. Taken this expertise and knowledge of our region's climate hurdles and the experience of multiple varieties both native and non-native, success is assured.

e. Experience cultivating plants for human consumption such as food or medicine products

In addition, NWCC's Nurseryman has propagated and delivered under contract tropical food crops and has also produced tissue cultured food crops for other nurseries outside of Florida

f. Experience with in-house propagation

NWCC's Nurseryman has grown and sold plants in various stages and sizes from field grown large trees to plants in small pots. The Nurseryman has extensive experience propagating plants from seed, cutting and a specialized process called tissue culture. The use of plant tissue culture propagation has become a main form of propagation in horticulture worldwide and has many benefits over other conventional propagation methods.

Plant tissue culture is a key component in most of the major horticultural crops requiring clonal (asexual) propagation of a large number of plants requiring high sustainability and reliability

levels. Cannabis production with a plant tissue culture propagation component would have several advantages over a conventionally propagated programs;

Advantages of propagated programs:

- Tissue culture provides a sustainable and reliable year-round production system unaffected by climate or seasonal changes.
- Tissue culture provides fast scale-up of production numbers which can help cannabis growers and breeders introduce new cultivars of cannabis with important traits to the market place.
- Tissue culture helps growers maintain disease free status of stock plants and progeny by producing plants under laboratory conditions with almost zero threat from common insects and diseases.
- Tissue culture can be used to help growers and researchers maintain known genotypes of cannabis for extended periods of time under optimal conditions.

g. Experience with genetic modification or breeding

The purity of Be Mindful's products starts with genetics. NWCC will be given access to Be Mindful's genetic library [REDACTED], arguably among the purest and most diverse collection of cannabis genetic material in the world. Each genetically distinct cannabis strain has a unique set of biologically active compounds that have therapeutic benefits for specific medical conditions. Specific to the State of Florida, Be Mindful currently [REDACTED] [REDACTED]. It is important to note the commitment to genetics due to the constant breeding and testing done to create more strains to treat specific conditions.

Seed and Clonal Propagation Cultivation

The Cultivation Department propagates marijuana plants naturally through seed and clonal reproduction.

- Production through Seed Germination
 - Advantage of seed reproduction is genetic diversity as many seeds from various sources are planted, guaranteeing fresh new plants from known sources that are pest and disease-free stock, exclusive to Be Mindful.
 - Disadvantage of seed production is slow seedling growth requiring attention prior to knowing the sex characteristics of each plant. 50% of all seeds will be male thus time will be dedicated toward culturing male plants that will eventually be discarded.
- Production through Asexual Cloning
 - Advantage of clonal reproduction is knowing the origin, and therefore, prior to the complete maturation of the plant growers know the sex, growth patterns, yield, quality, and flower time.
 - Disadvantage of clonal reproduction is the susceptibility to pest and disease outbreaks associated with mono-crop culture and overall lack of vigor in

comparison to seed-grown plants.

Seedling Germination Growth Standard Operating Procedures

- Prepare Personal Equipment and Environment
 - Before beginning operations ensure all personnel are properly equipped with a lab coat, properly sized nitrile gloves, a hair net and closed toe shoes.
 - Processing schedules and equipment should be prepared prior to beginning operations.
 - Ensure the environment, primarily air and water levels, are optimal for the self-germinating seeds.
 - Prepare 1.5-inch sterile rock wool cubes that have been conditioned with a mild nutrient solution and pH level of 5.5.
- Seed Germination
 - Select most promising seeds based on quality, appearance, health, and the need to propagate new varieties.
 - Measure the diameters of the high-quality seeds.
 - Place each seed in its own rock wool cubes as [REDACTED]
 - To ensure stout, tight, positive growth and prevent stretching of the stem, adjust lighting to allow seeds to receive 24 hours of bright direct light from T5's.

In addition, the Nurseryman has extensive knowledge of sexual breeding of ornamental plants using various techniques allowing him to introduce new plant varieties to the industry.

h. Experience using clean growing rooms

Prevention of Contamination Procedures

Established cultivation protocols associated with standard indoor cultivation and production practices that have been proven to produce the highest quality products that are free of contaminants are enforced.

The following protocols are in place to provide safe, high-quality derivative products:

- Cultivate seeds to produce a 100% pest and disease free environment. Eliminate living plant material in the facility to reduce contamination risk.
- All plants are grown in a 100% sterile, inert growing medium, eliminating the possibility of exposing the facility to soil born pests and pathogens associated with traditional growing mediums such as soil or coconut coir.
- The facility operates as a static, negative pressure environment, and therefore air flow in and out of the structure is controlled. The following protocols are adhered to in order to protect the facility from contamination:
 - All intake air is HEPA treated to prevent the indoor environment's exposure to airborne pathogens such as mold spores and fungi.
 - Exhaust air receives the same HEPA filtration with the addition of activated carbon filtration to mitigate smells associated with the cultivation of medical marijuana.

- Irrigation water is filtered through the use of reverse osmosis, and de-chlorination filters. This controls variables associated with water quality as well as a pure base foundation which requires less chemical manipulation for optimal solutions applied to plant material.
- State of the art nutrient dosing system is implemented for encouraging plant growth.
- Use of drip irrigation and rock wool growing culture allows precise nutrient dosing and maximizes feeding to the plant, as well as minimize run off.
- Custom blending of nutrients allows the NWCC to tailor make nutrients geared to steer plants at certain stages of growth. This also controls all inputs and limits employees and plants to unwanted heavy metals and chelation agents associated with bulk commercial fertilizer mixes.
- Ambient air is tightly monitored and controlled using environmental controls to maximize plant growth and create a safe and comfortable working environment for employees.
- Proprietary plant flushing practices properly purges plants of residual nutrient and other chemicals
- Enforce a professionally monitored IPM (integrated pest management) program where any pesticide treatment- organic or otherwise- are performed by state and EPA certified pesticide application personnel.
- Harvesting and processing procedures are performed with the highest attention paid to food handling safety protocol by trained and certified employees. This ensures the highest safety and handling practices and limits exposure of contaminants to the product.
- Professional cultivation team members are trained and frequently updated on identifying signs of pests, disease and chemical imbalances. Plants are inspected every day by at least one highly trained professional cultivation team member. Any instances needing further attention are documented and addressed by a lead cultivation team member.
- A clean quality environment is provided to produce a plant free of mold, disease, heavy metals and other contaminates.
- Strict protocols are in place for setting and resetting grow rooms. Beginning with proprietary grow tables are thoroughly cleaned and disinfected after every use.
- All grow room environments are sanitized with a 5% bleach solution after every cycle.
- All trimmed plant material is removed and discarded daily.
- Grow room environments have controlled air movement which circulates significant amounts of air around each plant.
- All nutrients are OMRI (Organic Materials Review Institute) certified.
- Mold mitigation is accomplished through a regulated and monitored environment with special attention paid to relative humidity. Relative humidity levels are targeted at or near 50% and inhibits mold and mildew development.
- Genetic lines that are cultivated have shown an ability to resist mold and mildew frequently experienced by other growers. The cultivation department is selective

breeding of plants with specific physical characteristics helps minimize mold and mildew development as well.

- Any contaminated, diseased or unhealthy plant is culled from the grow rooms and disposed of following plant destruction protocols.

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

Since its founding five years ago, Be Mindful has provided a steady, uninterrupted supply of medical marijuana products to registered dispensaries in its home state of Colorado, including four Be Mindful dispensaries located across the state. With an exemplary record of compliance and safety, Be Mindful has earned the respect and trust of government, physicians and patients alike.

The purity of Be Mindful's products starts with genetics. NWCC will be given access to Be Mindful's genetic library, arguably among the purest and most diverse collection of cannabis genetic material in the world. Each genetically distinct cannabis strain has a unique set of biologically active compounds that have therapeutic benefits for specific medical conditions. Specific to the State of Florida, Be Mindful's

It is important to note the commitment to genetics due to the constant breeding and testing done to create more strains to treat specific conditions.

The company has refined plant processing on a commercial scale, optimizing quality and maximizing plant yields. It has demonstrated an ability to scale its grow operation based on patient need and market demand. In the last five years, the company has grown its cultivation operation from 4,000 sq. ft. of usable space producing about 25 lbs./month, to 44,000 + sq. ft. producing more than 500 lbs./month. It has safely produced and transported more than 5,870 lbs. of pure and standardized product in full compliance, without adverse events or significant inventory discrepancies.

j. Experience with tracking each plant in a harvest

NWCC will harvest on a daily basis, ensuring every plant receives the appropriate care required throughout the harvesting and drying processes. The Manager responsible for harvesting will be responsible for staffing needs and work closely with the Manager responsible for Cultivation and Inventory throughout department procedures.

Harvesting Standard Operating Procedures

- Harvesting Manager prepares for the process
 - The Harvesting Manager calibrates all scales involved with harvesting on a daily basis.

- The Harvesting Manager inspects the harvesting area daily to make sure it is clean and sterile.
- The Harvesting Manager inspects all processing tools to make sure they were sterilized properly.
- The Harvesting Manager inspects trimming stations to make sure they are clean, sterilized and ready for the day.
- The Harvesting Manager meets weekly with the Cultivation and Inventory Managers to review the plant takedown calendar to ensure a timely takedown.
- The Harvesting and Cultivation Managers work together to ensure timely and efficient plant takedown, with correct plants to be harvested in the correct order.
- Cut, weigh and record the plants
 - Harvest the plants by cutting at the base of stem.
 - Weigh the plant.
 - Write the weight on the RFID tag.
 - Enter the weight of the plant into the tracking system.
 - If there are any quality control issues, the plant is immediately isolated for final determination.
- Trim the plant for wastes
 - The Processing Manager assigns the plants to trimmers.
 - The Trimmer removes fan leaves and any excess waste.
 - Place the waste in a waste bucket for the Processing Manager to weigh and record on the harvest electronic spreadsheet.
- Record and label the products
 - The Harvesting Manager enters all the waste product weights into the plant tracking software.

Drying Standard Operating Procedures

- Bring the new harvest to the Drying Room
 - Ensure the room is clean without any remnants from the previous harvest.
 - Move the racks of trimmed products into the room.
 - Ensure the room humidity level is at 50% or less.
 - Organize the bins on the rack by strain.
 - Harvesting and Inventory Managers weigh the bins.
- Dry bud material to prepare for Extraction
 - Dry bud material on racks.
 - When moisture level reaches 15% or less, material is ready for extraction.
- Harvesting Manager performs Quality Control Check
 - The Harvesting Manager visually inspects all products to ensure that there is no mold, mildew, pests, rot, gray or black plant material.
 - Dry bud material is weighed and recorded
 - Dry bud material is passed to the Extracting Room where it is weighed

and inventoried again.

k. Experience with good agricultural practices

Our Nurseryman, who has been in business in the Northwest region of Florida for more than 40 years received the Best Manufacturing Practices Governors Award in 2014. He has established thorough processes and procedures to ensure the best agricultural practices are in place to optimize quality and maximize plant yields.

l. Experience with good handling practices

Our Nurseryman, who has been in business in the Northwest region of Florida for more than 40 years received the Best Manufacturing Practices Governors Award in 2014. He has established thorough processes and procedures to ensure the best agricultural practices are in place to ensure good handling practices.

m. Experience with recalls

Rigorous procedures are in place to investigate and document all returns, complaints, and adverse events, as well as recall, re-test, store and ultimately dispose of any manufactured medical marijuana products that are deemed suspect or not compliant with mandated regulations. Every complaint and return will be documented and addressed immediately. Each will be brought to the attention of the Quality Assurance Officer who will be solely responsible for investigation and resolution of the issues across all systems. S/he will maintain close communication with the Department, notifying them within 24 hours of any returns, complaints, adverse events and/or recalls.

Policy for Recalls

The NWCC will conduct a recall of a product or products in the event of: 1) A mandatory recall requested by the Department; 2) A substantiated and confirmed complaint by a customer which is verified as suspect or hazardous through testing ; 3) A voluntary recall due to defective packaging or labeling, or a product that has been identified to have a health or safety concern not specified by the Department, or 4) A failed laboratory testing that may pose a health safety concern due to microbial or other adulterations, i.e. *Microbes, Mycotoxins, Solvent Residues*.

Procedures for Return, Complaint, Adverse Event or Recalls

In order to ensure 24/7 consumer safety and trust, a toll free recall number will be clearly printed on the label of each approved medical marijuana product. Provision will be made for emergency paging of an officer in charge should there be a true emergency. Patients may also come to their individual dispensary with a return. When a patient relates a complaint or return, the reason for the action will be recorded along with the name of the patient, the date and the staff person to

whom it was related. The Quality Assurance Officer will be notified immediately. S/he will debrief the patient and/or caregiver, and then consult with the certified physician and dispensing Pharmacist to determine whether the complication was due to a non-product related cause, e.g., incorrect dosage, improper administration. If a different cause is identified, it will be recorded in the complaint file. If no external cause was found, the product will be tested.

Product Re-Testing

A sample of the product will be expedited to an independent laboratory and tagged with a unique identifier for clear reference. A sample of the product will be retained for examination by the Department. If, upon retesting, the product is found to be consistent and in compliance with all State regulations and NWCC specifications, the result will be noted in the records and the patient will be counseled by the dispensing Pharmacist with support of the Quality Assurance Officer, if necessary. If the product is found to be faulty, whether due to contamination, inconsistent cannabinoid profile or other problem, the Department will be notified, and recall and hold procedures will be enacted immediately. Such products will be returned to the manufacturing facility and will be disposed of in a way that renders them unusable, as per below.

Recall Parameters and Procedures

Product Identification

In the event of a recall, the following information will be obtained by Site Management: product identity (lot, code date, serial number); description of defect; date; circumstances under which defect was found; evaluation of risk; production quantity; and estimated quantities of distribution. The most effective and efficient recall strategy will be determined and executed. Assessment of production quantities and amount and destinations of product shipped will be made and an immediate recall will be carried out.

All products in processor control will be placed in quarantine and proper hold procedures will be followed. Any existing material within the manufacturing facility or dispensaries will be placed on hold. If feasible, transports with recalled material will be canceled. Otherwise, the recalled products will be flagged and the receiving dispensaries will be notified that the incoming product is to be immediately quarantined.

Recall Protocols

- ❖ NOTIFICATION - The Quality Assurance Officer will notify the Department about complaints, adverse events and recalls within 24 hours.
- CONDUCT TRACEABILITY PROCEDURES - Records will be consulted to check for and reconcile any deviations or discrepancies that have occurred. All product and materials affected by this deviation may be considered potentially hazardous and will be quarantined and disposed of as mandated.
- RECALL WINDOW - The Quality Assurance Officer will determine if the incident is isolated to a specific lot or if there is potential for distribution among other lots,

products and/or ingredients. In the event that the recall is a result of contamination, s/he will attempt to pinpoint the manufacturing juncture at which the product was adversely affected.

- DEPTH OF RECALL – Thorough tracing will determine how deep the recall is within the supply chain and the extent to which the recalled product was disseminated (warehouse, dispensaries, patients/ caregivers). This will be accomplished through the Product Traceability Worksheet (see below).
- EFFECTIVENESS CHECK - Site Management will initiate specific checks with each dispensary to confirm that proper removal of the product is carried out. This will include the reconciliation of the total amount of the recalled product received by the dispensary, the quantity sold to individual recipients, and the remainder in storage. The identity of the recipients will also be documented. All dispensaries, staff, patients and caregivers who received the faulty product will be notified immediately via phone and e-mail. A recall notification also will be posted on the NWCC's website. Recipients will be asked to confirm in writing that they were notified of the recall.
- REPLENISHMENT AND REIMBURSEMENT - Site Management and the Quality Assurance Officer will identify specific lots that may be available for replacement. Customers will be reimbursed for any material that cannot be replaced.
- PRODUCT DISPOSAL - Disposal methods will ensure that all recalled material are destroyed in a manner that renders it completely unusable and prevents further circulation.

Quarantine Procedure

NWCC will place recalled items in quarantine as mandated by the Department. A "QUARANTINE" tag will be applied to the pallet or container of the product. The "QUARANTINE" tag will include the: brand, lot number, amount of product held, reason for holding, final product disposition and the contact responsible for final disposition and date. The quarantined products will not be transported, distributed or dispensed without express approval from the Department. Product Holds that may pose a safety or cross-contamination threat will be segregated from other product in the storage bay and placed in the quarantine area. All products that are placed on hold will be reported to identify corrective actions, preventative measures and root cause.

Disposal Procedure

NWCC will grind and shred all recalled or contaminated product plus waste plant material with grow medium (recycled coconut husk), rendering them unusable and unrecognizable. If not contaminated, the ground waste material will be composted and eventually used as a soil additive. If contaminated, the waste material will be disposed of in ways recommended by the Department.

- n. **Any awards, recognition or certifications received for relevant expertise**

Our experts, Billy Pope received the California medical cannabis cup for Outstanding Grower in the State and Gary Hennen won the prestigious award in Florida for the Best Manufacturing Practice in Florida 2013.

2. Infrastructure

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

Medical marijuana products will be transported between the manufacturing facility and dispensary facilities in a NWCC armored vehicle. Contents will be in a separate locked area, and not be visible from outside, accompanied by at least two armed Security Guards. One Security Guard will remain with the van and contents at all times. In order to prevent theft or diversion, all transported items will be recorded in a shipping manifest and packaged in large tamper resistant, traceable containers with a GPS tracking device sealed inside that will be monitored at ten second intervals. The product shipment room will be monitored by video surveillance and controlled by the SAS, allowing only authorized individuals to the room. All transportation will be delivered directly without any stops in between except for refueling or an emergency. The armed transportation personnel will assess the surrounding area for potential threats, to confirm the area is secure and safe for product transaction.

To prevent theft or loss of cash, the dispensary facility will only keep enough cash or currency on site to enable normal business practices without interruption. All cash will be locked within a tamperproof safe located within the safe room that has been secured to a main structure of the building. There will be random cash pick-ups from the dispensary to ensure that large amounts of cash do not remain on the premises. Cash will be picked up by the armored car service, Garda Cash Logistics, and transported directly to the company's financial institution. Cash will be brought to the armored vehicle by Be Mindful Medical's security staff directly from the cash vaults on the premises. Any discrepancies will be immediately reported to the bank's Manager, and to the Dispensary's Business Manager, who will contact the Head of Dispensary Operations.

b. Communication systems

Electronic Security Systems

The installed electronic security systems will utilize comprehensive technology and commercial grade equipment. The systems will orchestrate automatic responses between devices and communicate with security staff stationed to respond to emergency situations. The systems

Cybersecurity

NWCC will have airtight protocols to ensure the privacy and security of clients, employees and partners through the security of electronic data, prevent unauthorized access, loss or theft, as well as to recover lost or stolen data. All records—financial, manufacturing, dispensary, patient, and employee records—will be maintained in electronic format. Computer software will be password protected and accessible only to authorized employees to ensure the integrity of patient records, security measures, combination numbers, passwords, and electronic and/or biometric security systems. The company network will be separate from the public Internet with strong user authentication mechanisms and enforcement systems such as firewalls and web filtering proxies, as well as the restriction of email and internet systems to be used for the company exclusively. Employees may not disclose confidential information concerning the company, its financial, operational and security data, nor any records of patients/caregivers/practitioners to any third parties during or after employment. The IT Network server and all company records and patient information will be stored in a secure locked location. All records will be preserved for five years and provided to the Department upon written request.

c. Methods of mitigating odors if applicable

The cultivation facility will be operated as a static negative pressure air environment. Meaning each exterior door and opening will have a slight amount of airflow that flows into the building rather than out of the building.

Office space, employee ingress and egress, plus loading dock bays will operate in this manner. We estimate “uncontrolled” air entering the building will represent less than 2% of total air introduced into the facility..

Makeup air deliberately introduced to the facility will be forced air with HEPA filtering including electrostatically charged air scrubbers which will filter pollen and dust particles from introduced air.

Deliberately exhausted air which makes up an estimated 98% of all exhausted air from the facility will be forced through activated charcoal filters scaled suitably for our specific application and flow rates. All air will be exhausted at roof height or approximately thirty feet in our case.

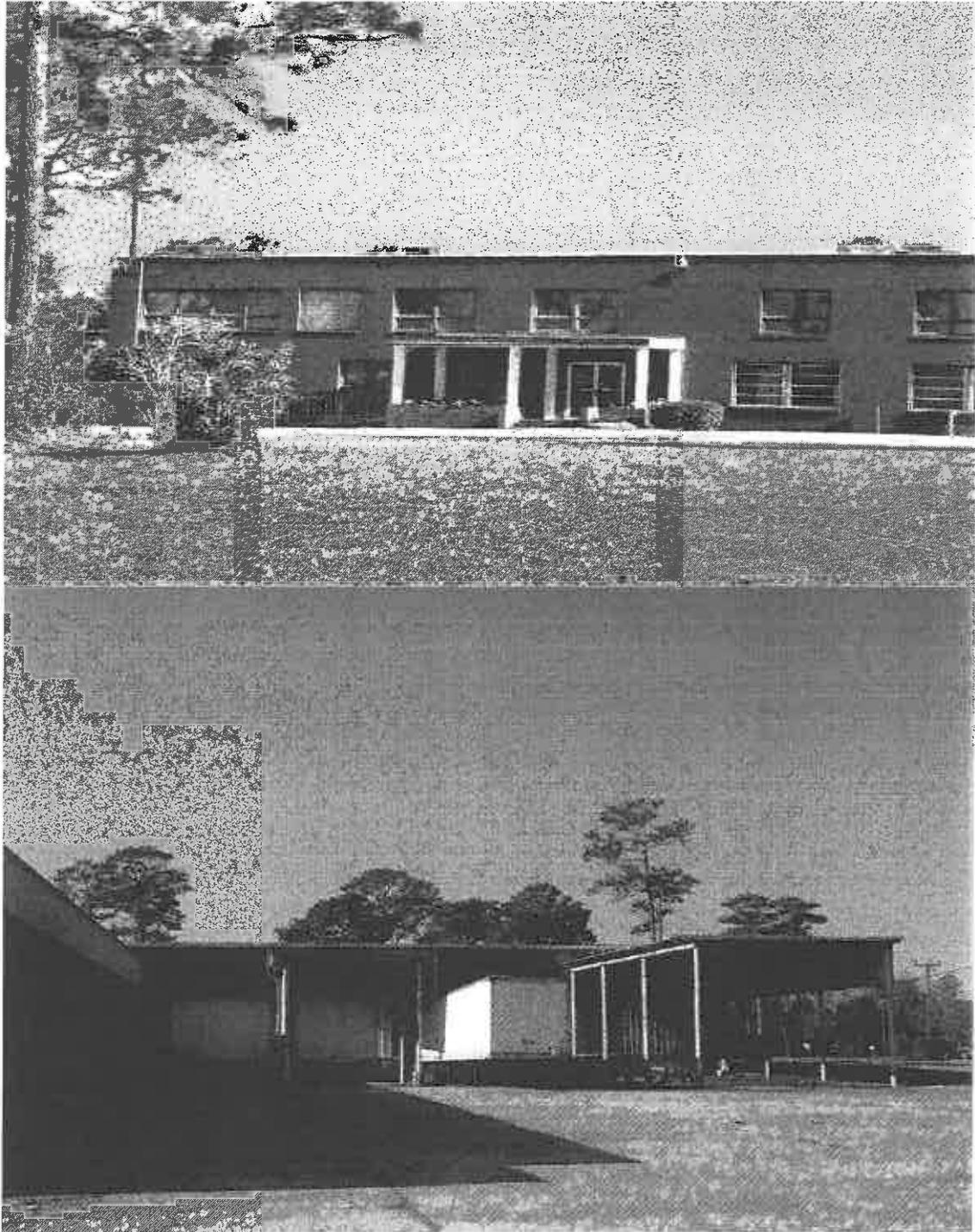
All flow rates and equipment sizing will be adjusted as we expand the facility and add various rooms into production over time.

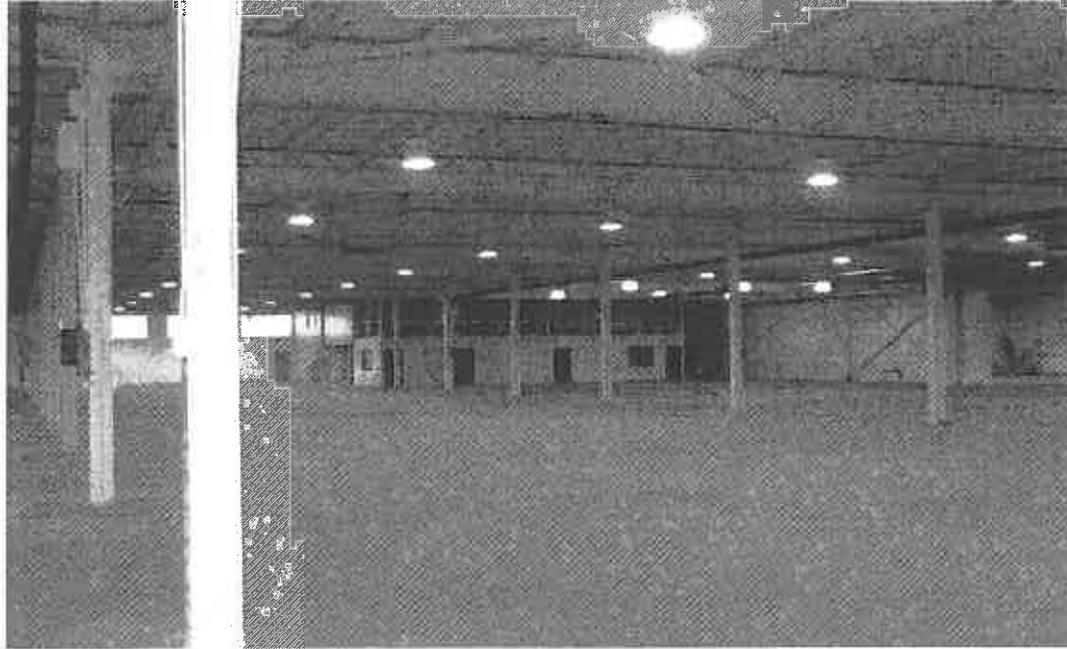
3. Premises, Resources, Personnel

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.

Location of Cultivation property: High Bridge Road, Quincy, FL





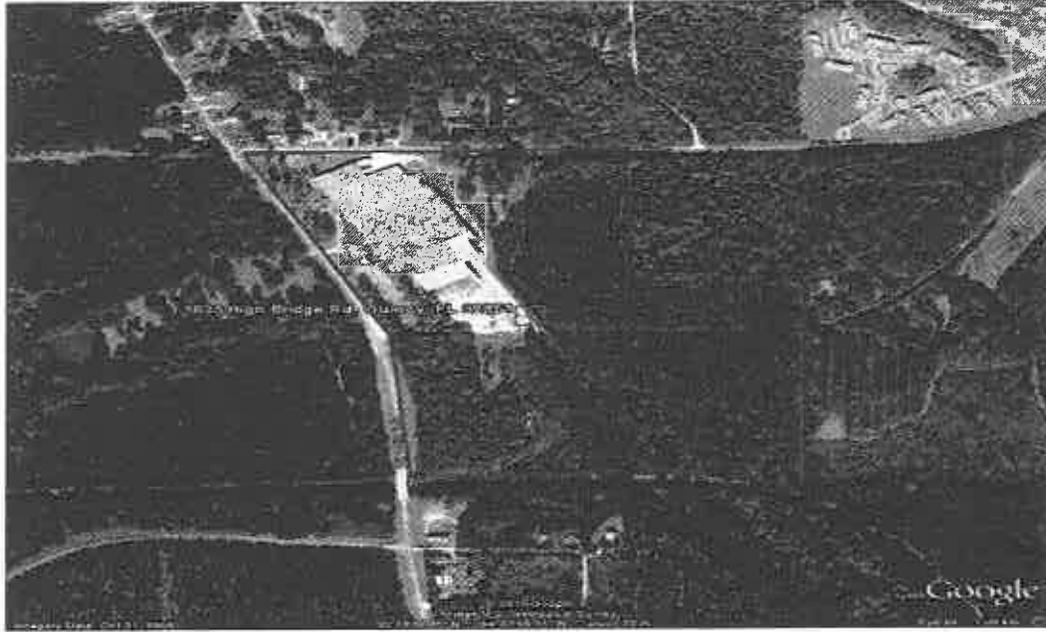
b. Compliance with local regulations regarding sanitation and waste disposal

NWCC has received full approval and written support for this project from many decision makers within the community. With the property secured, and engineers, plans, and local support in place, NWCC is positioned to begin operations expeditiously upon application approval.

c. The ability to obtain zoning approval

See Attachment 1: Chapter 4 Land Use Categories

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); iv. Cultivation environment, e.g. greenhouse, clean room, aseptic, etc and iv. Environmental control system(s).

To meet the immediate needs of Florida State patients, NWCC's manufacturing center will be built in two phases: In Phase One, construction of a new 5,000 square foot indoor facility and a 1 acre secure greenhouse will be built immediately after licensing. The 5,000 sq. foot facility will include two flower rooms and discrete extraction, packaging and labeling areas. This will allow dispensing of product to patients, including our High CBD formulation to bring relief to seizure patients. The 1 acre greenhouse will grow an estimated 12,500 lbs. of medical marijuana per year. This plant matter will be converted to 570 k grams of medical marijuana oil. Assuming that the average patient consumes 50 mg/day, or 18.25 grams per year, this will meet the needs of 31,000 patients.

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

An additional 30,000 square foot production facility will be added in the Spring of 2016 or with patient demand. The size of the property will allow for seamless scaling to include more greenhouses and expanded processing based on patient demand.

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

To meet the immediate needs of Florida State patients, NWCC's manufacturing center will be built in two phases: In Phase One, construction of a new 5,000 square foot indoor facility and a 1 acre secure greenhouse will be built immediately after licensing. The 5,000 sq. foot facility will include two flower rooms and discrete extraction, packaging and labeling areas. This will allow dispensing of product to patients, including our High CBD formulation to bring relief to seizure patients. The 1 acre greenhouse will grow an estimated 12,500 lbs. of medical marijuana per year. This plant matter will be converted to 570 k grams of medical marijuana oil. Assuming that the average patient consumes 50 mg/day, or 18.25 grams per year, this will meet the needs of 31,000 patients.

In Phase Two, an additional 30,000 square foot production facility will be added in early spring, 2016 or with patient demand. The size of the property will allow for seamless scaling to include more greenhouses and expanded processing based on patient demand.

i. Access to water resources that allow for sufficient irrigation

Water will be prepared to use by reverse osmosis (RO). NFG plans to have two hyperlogic commercial water filtration systems to filter municipal water to create ultra low solvent to irrigate. Waste nutrients effluent will be captured and recycled.

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

- Cultivation Manager/Chief Grower – Manage all grow protocols, planning and purchasing
- Assistant Chief Grower – On-site management of grow and grow staff
- Growers – Responsible for cultivation activities
- Laborers – Perform heavy and other manual labor where/when needed
- Product Development Manager – Oversee product manufacturing, distribution, responsible for quality and uniformity of products, maintaining inventory
- Assistant Production Managers – Assist manager with product distribution; train packaging staff
- Extraction Technicians – Operate extraction equipment and prepare samples
- Product Assemblers – Assemble and weigh medicine; package, seal and label finished product; maintain appropriate stock level; clean and sanitize weigh stations
- Inventory & Warehouse Manager – Maintain a clean and organized warehouse; oversee all shipping and receiving; supervise inventory and recordkeeping; oversee tracking and labeling of inventory
- Bookkeeper – Responsible for payment of all bills and entering daily ledgers
- Cash Manager – Responsible for cash coming in and going out
- Human Resources – Maintain employee files, initiate new employees, update HR manuals
- Head of Inventory Management – Responsible for all inventory across all systems and facilities at Be Mindful Medical

- Compliance & Quality Control Officer – Develop, maintain and manage compliance and quality control programs program policies and procedures; develop and oversee system for handling violations; ensure that products meet standards of quality, safety, specified requirements and standardization; test sample products; develop and oversee system for handling any problems; maintain records of all product testing

See Attachment 2: Combined Job Descriptions_NWFLA

k. An organizational chart illustrating the supervisory structure of the cultivation function of the proposed Dispensing Organization

See Attachment 3: Cultivation Org Chart

l. Plans and procedures for loss of key personnel

North Florida Group has teamed with an industry leader and plans to use cross training and Department of Health and State of Florida approved training to ensure all key staff are able to competently step in as needed either short term or long term into all key positions.

m. Plans and procedures for complying with OSHA regulations for workplace safety

Safety of the staff is of the upmost importance to North Florida Group. NFG plans to organize a safety team with members of management and production staff. All regulations including required postings, reporting, MSDA postings, etc will be monitored by the safety team and overseen by administration.

OSHA compliant training will be completed by each member of the safety team and updated as needed.

Required Training Programs:

OSHA/workplace health and safety based training includes: Workplace general overview of Health and Safety, Emergency training, Personal Protective Equipment training, Respirator training

- Retail: METRC Training/Serv-Safe/Sell-SMART
- Cultivation: METRC Training/Serve-Safe/Colorado Dept of Agriculture Pesticide Applicator certification
- Packaging-Flower and Extraction: METRC/Serv-Safe
- Extract: METRC Training/Serve-safe
- Drivers: METRC/Safe Driver training (Kleiber)
- Inventory training: Denver Consulting Group: Seed to Sale Compliance training
- Packaging Training: Denver Consulting Group: Packaging and Labeling training

4. Accountability

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.

See Attachment 4: Floor Plans for Cultivation

b. Storage, including the following: i. Safes; ii. Vaults; and iii. Climate control

Ventilation, Humidity and Climate Control

Stringent humidity and temperature control, together with proper air circulation, are critical factors in successful cultivation of marijuana. To inhibit mold and mildew in both the indoor facility and greenhouse, the NWCC will continuously monitor and stringently regulate the ventilation and relative humidity of the grow rooms. Product flow throughout the facility will be “downstream,” ensuring that contamination is minimized and that plants coming to the production area are free of disease and true to their genetic source. To ensure that solvents used in the manufacturing are not released into the atmosphere, the extraction area will be well-ventilated, conforming to the International Fire Code requirement of 1 cubic foot per minute (CFM) of hazard exhaustion.

Storage

Strict separation will be maintained between plant materials and noxious chemicals such as cleaning materials. Nitrate-based and other fertilizers will be stored away from fuels, solvents and pesticides.

c. Diversion and trafficking prevention procedures

No sales or dispensing of medical marijuana product will be conducted at the manufacturing facility nor will the dispensary facilities produce or manufacture any form of medical marijuana. Medical marijuana products will be kept under locked conditions before/during/after production, during transportation, and distribution. Dispensaries will each have a vault for medical marijuana and for cash that are under strict access control.

The Security Plan incorporates physical security elements, electronic security systems, security staffing and detailed procedures to provide a secure environment for the safe and secure manufacturing of medical marijuana, transportation of product to dispensaries, and receipt, dispensing and sale of medical marijuana at the dispensaries. The Security Plan protects employees, patients and caregivers while simultaneously deterring and preventing entry into, and theft from, restricted access areas containing medical marijuana or cash. All security system equipment and recordings will be housed in secure locations as to prevent theft, loss, destruction,

or alterations. NWCC will design and install the primary security system and install a redundant alarm system. The systems will be flexible and scalable for future growth or additional security.

d. A facility emergency management plan

Emergency Procedures

In case of a fire: There are two fire extinguishers available for small fires. In the event of a major fire, dial 911 immediately, trigger the fire alarm, and exit the building promptly. After contacting the fire department, contact the Product Development Manager and Director of Manufacturing.

In case of a chemical spill: Refer to any and all information and guidance provided on the Material Safety Data Sheet. In the event of a spill that poses any serious threat to health or safety, call 911 immediately. After contacting the fire department, contact the Product Development Manager and Director of Manufacturing.

In case of any other emergency: In the event of any emergency which poses any serious threat to health or safety, call 911 immediately. After contacting the fire department, contact the Product Development Manager and Director of Manufacturing.

In case of over-pressurization: If the extraction vessel becomes over-pressurized, the vessel will automatically relieve pressure through an automatic pressure release valve. If the automatic pressure release valve is triggered, operators present in the extraction room should leave the room immediately and wait at least 5 minutes to allow the room to ventilate. A detailed investigation should be conducted shortly thereafter in an effort to understand what caused the over pressurization.

See Attachment 5: Emergency Mgmt Plan

e. System for tracking low-THC source plant material throughout cultivation

Inventory Control

Inventory of all materials will be tightly controlled throughout the production process. The control processes include a comprehensive inventory system that ensures that all materials and products are accounted for, whether saleable or scrap.

A Process will cover the complete inventory management experience, to track and reconcile inventories, investigate discrepancies and correct or prevent future actions.



[REDACTED]

f. Inventory control system for low-THC cannabis

Traceability

Traceability is critical to every part of the process. The NWCC will use Radio-frequency identification (RFID) tags in order to track the product throughout the entire production process, from seed and clone through final distribution. The RFID tags will enable the NWCC to closely monitor every movement and step within the production process.

Internal tracking tags utilizing RFID technology will be generated for each plant material, and allow for the precise identification of any product. In instances where an issue of contamination may arise, or a recall is required, the RFID tracking system will allow for the pinpointing of the source for any problems.

g. Policies and procedures for recordkeeping

Meticulous records must be kept throughout the preparation, extraction, processing, and packaging of products.

The raw material weight, type of raw material, final product weight, product type, batch number, date, and time of processing must be recorded.

A. "Concentrate Production Worksheet" is to be completed for each batch. After production is complete, these records are to be digitized and entered in METRC or other state selected Tracking Program as mandated by the MED. An example "Concentrate Production Worksheet" is available at the end of this training manual.

h. Methods of screening and monitoring employees

NWCC has joined together with Be Mindful, a recognized industry leader with unparalleled expertise and experience in marijuana growth and production. Yet, no matter how consummate an organization's experience may be in its manufacturing processes, it is, ultimately, powered by people, and it is that resource that truly distinguishes NWCC.

Careful planning has gone into the design of the NWCC staffing plan so that the goal of bringing an uninterrupted supply of uniformly consistent pharmaceutical-grade cannabis to patients suffering from certified debilitating and life-threatening diseases can be realized. The NWCC will utilize Be Mindful's extensive management and staffing experience to safely and responsibly comply with the State regulations governing the cultivation and production of medical cannabis (please see attached position descriptions).

General Staffing Practices

NWCC will demand strict ethical standards from its entire staff. Its policies and procedures require that all staff be 21 years of age or older and that employees have no convictions for felonies connected to the sale or possession of drugs, narcotics, or controlled substances. The Chief Legal Counsel will oversee rigorous background checks to ensure that all employees have no drug-related felony records. All key staff has already been identified and will be vetted to ensure both competence in their fields of expertise as well as their integrity and upstanding moral character. These will be individuals who are dedicated to community as demonstrated by the time they donate to serving others.

Moreover, in addition to putting together a team of highly capable, qualified and creative people to occupy the executive offices of its emerging company, the NWCC has assembled a group of people recognized for their expertise in such diverse areas as medicine and medical research, pharmacology, law, finance, and business to form an Advisory Group that will provide sage advice as NWCC goes from start-up to full implementation and beyond.

NWCC will adhere to strict protocols regarding sanitation and safety, security, and emergency procedures, the details of which are addressed in the organization's Operating Plan.

Its manufacturing center will have at least one senior member on staff with more than a year of experience in Good Agricultural Practices (GAPs). Its Quality Assurance Officer is both trained and experienced in quality assurance and quality control procedures as demonstrated in the attached resume.

Staff Training

The priorities of employee training at the approved marijuana facilities are:

- To ensure the safety and security of employees in potentially hazardous areas of marijuana processing as well as at the point of sale of a controlled substance;
- To prevent and detect diversion, theft or loss of marijuana and/or medical marijuana products; and
- To foster growth and career advancement for our employees.

Employees at the manufacturing facility will be trained in all facets of Good Agricultural Practices (GAP), including meticulous sanitation protocols for medical cannabis propagation, cultivation, harvesting, extracting, processing the brands and packaging the final product. They will learn about the necessity of keeping meticulous records throughout the preparation, extraction, processing, and packaging of products.

Employees using hazardous materials, such as pesticides and solvents, and potentially hazardous machinery to create marijuana extracts will be fully trained on how to use the equipment, will have direct access to applicable material safety data sheets, and be trained to handle and store all materials safely. They will learn exacting protocols for each process of cultivation and manufacturing, and will be expected to understand and follow them.

Employees at the dispensing facilities as well as drivers will learn about ways to protect the facility, the product and themselves by meticulously following all mandated security rules, such as, but not limited to, those related to the requirement of a Registry Identification Card for anyone on the premises who is not staff, keeping all entries locked at all times, and maintaining records which track inventory and sales as well as other recordkeeping procedures.

All employees will receive one week of training to be given by staff familiar with protocols, policies and procedures as they relate to the manufacturing and dispensing facilities. Employees will be trained in standard operating procedures; with hands-on audit-based training conducted on an on-going basis. They will be required to watch and learn from a training video series that will be accessible online. The video will be especially helpful to reinforce training and provide feedback on specific protocols. Staff will also receive ongoing additional training as needed.

Trainings will be conducted by experienced staff of the licensed Applicant including the CEO, Chief of Security, Cultivation Manager, Product Development Manager, and Compliance Officer. The Quality Assurance Officer will identify experts and vendor trainers to hold in-

house trainings for all production employees, as well as key conferences and seminars for qualified employees.

Employees with mandated and necessary certifications will receive any and all continuing education courses to ensure continued certification or licensure.

All employees will be hired on a probationary basis. After 90 days of initial employment, team members will be evaluated by their direct supervisor. If determined that a team member is a good fit, works collaboratively with fellow team members and demonstrates the ability to perform assigned tasks, they will be hired in a permanent capacity. At this time, they will be given a copy of Cannabis: Evolution and Ethno botany by Robert C. Clarke and Mark D. Merlin. This is recognized as the textbook for the cannabis industry. Significant training workshops modules on the origins, history, uses, breeding, taxonomy, and biology of this plant will be held in conjunction with assigned readings in this text.

i. Personnel qualifications and experience with chain of custody or other tracking mechanisms

Our Medical Director has worked closely with local and state law enforcement over the years in cases of rape, incest and other crimes against patients in his Obstetrical and gynecology practice. He has hands on experience in chain of custody procedures having testified as an expert witness multiple cases in which chain of custody was required to insure prosecution.

A major part in the chain of custody procedures is proper documentation and minimalizing/eliminating any chance of contamination. Nowhere is this more important than in criminal prosecution so to transition to cannabis production will be easily done.

In the case of Medical Marijuana this experience is invaluable to insure avoiding diversion of medications. Tracking and batch sampling is key. Tracking and sampling will allow quick removal of any defective product prior to distributing to the patient. This system is part of "Good Manufacturing Practices" as spelled out in the WHO's recent updated schedule. Our company has partnered with an independent laboratory approved

j. Personnel reserved solely for inventory control purposes

North Florida Compassionate Care will employ a Head of Inventory Management who will report to the Chief Financial Officer. S/he will be in charge of inventory across all systems and facilities at Be Mindful Medical, including raw materials, products, purchasing and orders.

Responsibilities will include:

- Day to day accountability for inventory across all systems and facilities
- Purchasing and ordering of all raw materials for all facilities
- Strong interface with Quality Assurance and Security to ensure that there is no theft or diversion of marijuana or medical marijuana products

- Regular audits and report to DOH, including access to the State-approved Seed to Sale system

k. Personnel reserved solely for security purposes

NWCC will employ an Information Technology & Cyber Security Office to establish and maintain all technology and security apparatus, including hardware and software to meet requirements to adopt and maintain security, tracking, recordkeeping, record retention and surveillance systems for: the cultivation, manufacturing, sale, delivery, transportation, distribution, or dispensing of approved medical marijuana products by the Applicant.

Responsibilities will include:

- Develop and implement specific measures for the protection of all electronic data throughout the company and its facilities; measures will prevent unauthorized access to data, prevent loss or theft of data and allow for the recovery of lost or stolen data;
- Design and implement measures and procedures to protect the privacy of certified patient, designated caregiver, employee and partner medical and personal information;
- After consultation with, and obtaining written approval from, the CEO, purchase all necessary and appropriate hardware (e.g. computers, back-up systems, back-up power sources and networking equipment), and services (e.g. Internet, secure Wi-Fi, anti-virus, firewall and cloud services), for the manufacturing facility and four dispensaries;
- Install hardware and provide a state of the art, secure networking system that offers industry standards of high security protection against loss, theft or diversion of product or corruption of information;
- Secure and encrypt systems as appropriate and supervise the use of access controls, including passwords, PINS, biometrics, encryption and two-factor authentication;
- Implement a business continuity and IT disaster recovery framework;
- Watch and learn from the webinar training, as well as any other training to be developed
- Develop detailed knowledge and understanding of the three main technical components of the Medical Marijuana Program (MMP): The Medical Marijuana Tracking and Management Solution; The Medical Marijuana Module in the existing NYS Clinical Laboratory Information Management System (CLIMS); The Seed to Sale Tracking Solution;
- Set up the technical components at each facility and enable all hardware and related software to work securely and seamlessly;
- Train staff in the use of the technical components and all security-related policies, protocols and procedures, including physical, data and network breach occurrence or incident protocols; provide ongoing training, as needed, both in groups and on an individual basis;
- Interface with the software developers and/or the NYS DOH through their help desk protocol to be developed, to troubleshoot problems or issues with the software; and
- Be available for off-hour emergency calls.

l. Waste disposal plan; and

NWCC waste disposal program will be fully compliant with the DOH rules and regulations. Cannabis Waste- Cannabis waste will be stored, secured, locked and managed in accordance with State regulations and as submitted and approved in the cultivation center's Operations and Management Practices Plan. All cannabis plant waste will be rendered unusable through incorporation with other ground materials so that the resulting mixture is at least 50% non-cannabis waste by volume.

Compostable Mixed Waste: Cannabis waste from the facility will be disposed of as compost, after having been mixed coco, the primary grow medium in a ratio of at least 50% coco to 50% cannabis material. All plant material will be ground through a chipper prior to being mixed in the compost collection vessel.

Non-Compostable Mixed Waste: Auxiliary facility waste to be disposed of will be mixed with the following types of waste materials: 1) Paper waste; 2) Cardboard waste; 3) Plastic waste; 4) Soil; or 5) Other wastes approved by the Department (e.g., non-recyclable plastic, broken glass, leather). All recyclable waste will be recycled.

All cannabis waste and unusable product will be weighed, recorded and entered into the inventory system prior to mixing and disposal. Verification of this event will be performed by a supervisor and conducted in an area with video surveillance.

m. Access to specialized resources or expertise regarding data collection, security, and tracking.

NWCC will utilize Be Mindful's proven process for data collection, security and tracking.

CHAPTER 4

LAND USE CATEGORIES

SECTION 4000. LAND USE.

Subsection 4001. Purpose.

The purpose of this Chapter is to describe the Land Use Categories, the allowable land uses within those categories and the land use districts depicted on the Future Land Use Map Series. These regulations are intended to allow development and use of property only in compliance with the goals, objectives and policies of Gadsden County as expressed in the Comprehensive Plan. This Chapter delineates the distinction between Land Use Categories (Section 4100) and types of Land Uses (Section 4200). Table 4300 depicts the land uses allowable in each district.

(Ord. # 2003-006, 8-19-03)

Subsection 4002. Establishment of Categories and Districts.

Land use categories for Gadsden County are established in the Comprehensive Plan and Future Land Use Element. These land use categories are established and depicted on the future land use map series as amended. These categories shall be the determinants of permissible activities on any parcel in the jurisdiction. Refer to the Future Land Use Element of the Comprehensive Plan for the definition of each category. Allowable uses are listed in Subsection 4200 to correlate individual land use activities with the land use categories.

(Ord. # 2003-006, 8-19-03)

SECTION 4100. Land Use Categories.

In order to carry out the purpose and provisions of the Gadsden County Comprehensive Plan, the County is hereby divided into the following land use categories:

- A. Urban Service Area (USA)
- B. Rural Residential (RR)
- C. Agricultural (Agricultural 1, 2 and 3)
- D. Neighborhood Commercial (NC)
- E. Commercial (COMM)
- F. Light Industrial (LI)
- G. Industrial (IND)
- H. Conservation (CONS)
- I. Recreation (REC)
- J. Silviculture (SILV)
- K. Public (PUB)
- L. Historical (HIS)
- M. Mining (MINING)

(Ord. # 2003-006, 8-19-03)

Subsection 4101. Urban Service Area (USA).

The **Urban Service Area** land use category provides for the widest range of mixed uses and the highest density and intensity of development. Residential uses are allowed at a maximum density of five (5) dwelling units per acre (5:1), with appropriate supporting services. Residential, commercial, professional service office, light industrial, recreation, public and historic land uses are permitted in this category. Urban infrastructure exists or is planned for expansion or installation to serve the allowable densities and intensities permitted in this category. Development performance standards are provided which support the mixed use and intense development of this category. Maximum densities shall depend on the availability of supporting infrastructure as follows:

(Ord # 2003-006, 8-19-03)

Table 4101 Required Infrastructure for Residential USA Development

Land Use Category	Minimum Lot Size	Required Infrastructure*
USA1	1.0 Acres	paved public roads
USA2	0.5 Acres	central water and paved roads
USA5	0.2 Acres (except multi family)	central water, central sewer and paved roads**

*Paved Roads are a minimum requirement for all development in USA.

**Central Water and Sewer are required if the adjacent municipality has permitted capacity and the existing service is within 0.25 miles of the development.

(Ord 2003-006, 8-19-03)

1. **High Density Development:** High density residential uses, (lots less than 1.0 acres), within the Urban Service Area land use districts can be developed concurrent with the provision of the supporting infrastructure systems. In order to achieve these densities and preserve the quality of life in a rural setting, residential units, whether single family or multi-family shall be site built structures using prefabricated component units no greater than wall sections or truss systems. Multi family development shall not exceed the net density requirement of 5DU/acre.

(Ord 2003-006, 8-19-03)

2. **Mixed Uses Coverages:** The intensity of non-residential land use, as measured by area, shall not exceed sixty-five percent (65%) *per* USA district. The relative proportion of land uses is intended to be:

Residential	50%
Commercial	25%
Lt. Industrial	20%
Other	5%

(Ord 2003-006, 8-19-03)

3. All non-residential development applications in Urban Service Areas are Class II developments requiring a public approval process through the Planning Commission and the Board of County Commissioners.

(Ord 2003-006, 8-19-03)

Appropriate neighborhood commercial uses are also permitted in accordance with the non-residential performance standards contained in this Code. Existing agricultural uses in Rural Residential areas may be grandfathered until such time as residential development is appropriate.

(Ord 2003-006, 8-19-03)

Subsection 4102. Rural Residential.

The **Rural Residential** category represents those areas that are suitable for development at moderate densities and/or intensities. Residential development density is based upon a minimum lot size of one acre. The Rural Residential category development standards are designed to encourage development consistent with nearby agricultural uses. Clustering of residential units is encouraged for site built homes, provided net density does not exceed one dwelling unit per acre, and adequate buffering is provided for dissimilar development. Due to the historical loss of value of mobile and modular homes, clustering will not be permitted for subdivisions that do not restrict mobile home development. For Subdivisions that restrict new housing to site built homes, clustering may be calculated on gross acreage rather than net density.

(Ord 2003-006, 8-19-03)

Density shall be calculated, for clustering purposes, on that portion of the parent parcel or parcels that is not included in jurisdictional wetlands or flood prone areas. Density considerations may be made up to a minimum lot size of 0.25 acres for regulated low income or very low income housing initiatives approved by the Department of Community Development. No lot less than one half of an acre shall be created under clustering provisions. All lots created on private streets that are platted to centerline shall have the minimum lot size contained outside of access easements.

(Ord 2003-006, 8-19-03)

Subsection 4103. Agriculture.

The **Agricultural** land use category is divided into three (3) subcategories. The subcategories in the Agricultural land use category and their corresponding densities are as follows:

(Ord. # 1999-002, 8-18-99)

1. Agriculture 1 (1:5)
2. Agriculture 2 (1:10)
3. Agriculture 3 (1:20)

(Ord 2003-006, 8-19-03)

The Agricultural category designates those areas that are to be protected for the continuation or establishment of agricultural activities. All agricultural activities may be allowed, including silviculture land uses. Limited residential may be allowed, provided gross density requirements are maintained as permitted by each subcategory and Recreational Vehicle Parks and campgrounds may be permitted with a special exception permit in (Agriculture-3 (AG-3)) areas in close proximity to major transportation facilities such as I-10 and US 27 and in close proximity to natural and recreation areas. These uses must be approved pursuant to

the Type II review procedure. For criteria for density and intensity of development refer to §5200 and Subsection 5900.

(Ord. 2006-020, 8-8-29-06)

Residential clustering is encouraged to protect sensitive environmental areas.

Table 4103 Residential Clustering in Agriculture

Land Use Category	Maximum Gross Density	Minimum Lot Size Un-clustered	Minimum Lot Size, Clustered	Minimum Easement
Agriculture 1	1DU/5 Acres	5.0 acres	2.0 acres	50%
Agriculture 2	1DU/10 Acres	10.0 acres	4.0 acres	50%
Agriculture 3	1DU/20 Acres	20.0 acres	5.0 acres	65%

(Ord. 2003-006, 8-19-03)

Appropriate neighborhood commercial and residential clustering uses are permitted in accordance with the performance standards contained in this Code. Preserved areas created under Rural Residential and Agricultural clustering shall remain under protection for a minimum of 30 years and shall be protected by plat and deed restriction. Conservation areas may be platted in rear lot areas provided that they do not make up more than twenty-five percent (25%) of the lot area.

(Ord. 2003-006, 8-19-03)

Subsection 4104. Neighborhood Commercial

The Neighborhood Commercial Land Use Category allows a mixture of light commercial uses or services of a convenience nature whose primary market base is the local neighborhood. Recreational Vehicle Parks and Campgrounds may be permitted in the Neighborhood Commercial land use category as a special exception use in areas in close proximity to major transportation facilities such as I-10 and US 27 and in close proximity to natural and recreation areas. These uses must be approved pursuant to the Type II review procedure. For criteria for density and intensity of development refer to §5200 and Subsection 5900. These services are intended to serve the needs of the local community. For location requirements that define the overlay districts allowing new neighborhood commercial uses in Rural Residential and Agricultural Districts, see Subsection 4202(C).

(Ord. 2003-006, 8-19-03) (Ord. #2006-020, 8-29-06)

Subsection 4105. Commercial.

The Commercial land use category provides for a predominance of general and high intensity commercial activity, as well as professional services and office uses, institutional and public service/utility uses. Mobile home parks and Recreational Vehicle Parks may be permitted in the Commercial land use category as a special exception use. These uses must be approved pursuant to the Type II review procedure. For criteria for density and intensity of development refer to §5200 and Subsection 5900. (Ord. 2003-006, 8-19-03) (Ord. # 2006-020, 8-29-06)

Subsection 4106. Conservation.

The **Conservation** land use category designates those areas having environmental characteristics that limit development potential. The land in this category has been identified in the Gadsden County Comprehensive Plan as having low development capability, or one or more characteristics which require preservation and/or conservation. Agriculture and silviculture land use activities are permitted in these areas.

(Ord. 2003-006, 8-19-03)

Subsection 4107. Recreation.

The **Recreation** land use category includes most outdoor recreational and open space uses, such as parks, public recreation facilities and preservation areas. These uses are generally characterized by large site areas and minimal permanent development except for access roads and public amenities, although specialized recreation buildings are allowed. Restricted residential densities one (1) dwelling unit per forty (40) acres (1:40) are permissible.

(Ord. 2003-006, 8-19-03)

Subsection 4108. Public.

The **Public** land use category provides for educational uses, recreational uses and public facilities, grouped into one category pursuant to Rule 9J-5, F.A.C. Uses in this category include institutional, outdoor recreational and public service/utility.

(Ord. 2003-006, 8-19-03)

Subsection 4109. Historical.

The **Historical** land use category provides for the recognition and designation of historic resources and sites throughout Gadsden County. Further designation of historic resources and sites may be designated on the Future Land Use Map series by amendments to the Comprehensive Plan. Minimum criteria would include listing on the Federal Register of Historic Places, The State of Florida Site File or nomination by a Gadsden historical society with standing.

(Ord # 2003-006, 8-19-03)

Subsection 4110. Light Industrial.

The **Light Industrial** land use category provides development opportunities for a wide range of research and development, light assembly and manufacturing and service companies that may require fleet parking and minimal outside storage of raw or finished products.

(Ord # 1999-002, 8-17-99)

Subsection 4111. Industrial.

The **Industrial** land use category provides for areas to locate wholesale and retail business for heavy manufacturing, processing, storage or the distribution of goods. Included in this category are uses which require primarily outdoor storage or industrial activities conducted

outdoors. These uses generally have more significant off-site impacts than Light Industrial uses.

(Ord # 1999-002, 8-17-99)

Subsection 4112. Mining.

The **Mining** land use category has been established to designate areas for mining land use activities and to recognize the economic importance of the Attapulgitite mining industry in Gadsden County. This category has also been established to locate any surface mining, rock quarries and extraction activities. The refinement, packaging and processing plants or extracted materials are included as allowable uses. Physical plant construction shall be subject to the development review process in compliance with the standards for industrial development contained in this Code.

(Ord # 1999-002, 8-17-99)

Subsection 4113. Silviculture.

The **Silviculture** land use category is established to preserve large tract timber production properties. The loss of the paper production facilities in Port St. Joe has created an economic environment that encourages the breakup of the traditionally large acreage timber lots into smaller private holdings. This category is intended to preserve large holdings while retaining some rights for limited residential uses. Home sites in the Silviculture category require a minimum lot size of eighty (80) acres. No commercial activities are permitted.

(Ord # 2003-006, 8-19-03)

SECTION 4200. LAND USES.

Subsection 4201.

This part of the Code describes the specific types of land use activities allowed in the land use category as described in the Comprehensive Plan and this Land Development Code.

(Ord # 1996-005, 7-2-96)

Subsection 4202. Types of Uses.

A. Residential Uses.

1. The category of residential uses includes single-family dwellings, accessory apartments, multi-family dwellings in a variety of housing types, modular and manufactured housing, but specifically excludes recreational vehicles (RVs) parks. Recreational vehicles (RVs) parks are considered commercial uses and as such, are located in commercial land use categories except when located in an Agriculture-3 (AG-3) or Neighborhood Commercial Overlay (NC) land use category with a special exception use permit. This does not preclude the parking of RV's on parcels of land, provided that the RV is owned by the person who owns the parcel of land, is associated and accessory to a primary permitted use and the RV is not used for residential purposes. All classifications of residential subdivisions are located on agricultural or residential lands only. (Ord. # 1999-002, 8-17-99) (Ord. # 2006-020, 8-29-06)

2. Livestock shall be prohibited in residential areas where the keeping or use of any livestock destroys or materially impairs the value of adjacent premises. "Materially impairs" shall include, but not be limited to unpleasant odors. Horses and other equine species or breeds as pets may be permitted on properties of less than five (5.0) acres as a special exception use only to be permitted by the Planning & Zoning Commission and the Board of County Commissioners. (Ord # 2003-006, 8-19-03)

B. Agricultural Uses.

"Agricultural uses" means activities within land areas which are predominantly used for the cultivation of crops and livestock including: cropland; pastureland; orchards; vineyards; nurseries; ornamental horticulture areas; groves; confined feeding operations; specialty farms; and silviculture areas. (Ord # 2003-006, 8-19-03)

Agricultural land uses include croplands, pastures, silviculture, aquiculture, feed lots, wholesale plant nurseries, and buildings which are an accessory to these agricultural uses. This category of uses does not include processing or distribution plants for agricultural products and supplies, unless the processing and distribution plants are primarily for agricultural products produced on-site. Other agricultural products that are not produced on site may be sold from agricultural properties, provided the agricultural products do not make up more than fifty percent (50%) of the total annual inventory which is to be sold. Livestock pens that have existed and have been in prior use since 1991 but are surrounded by predominantly residential lands will be sun-setted. Such lots will be notified and will have a maximum of five years to relocate operations to largely agricultural areas.

(Ord # 1999-002, 8-17-99)

1. Certain non-agricultural uses by right are allowed in all Agricultural land use categories, provided site plan approval is granted by the Planning Department. Uses by Right are as follows:
 - a. Sales of produce and other agricultural products, which are not produced on site, provided such products do not make up more than fifty percent (50%) of the total annual inventory which is to be sold.
 - b. Carnival and fair uses. Such carnival and fair activities must be a temporary use. For purposes of this code, temporary means no longer than three (3) months. These will be permitted as Class II developments. Any activity with an anticipated attendance of over 5,000 shall require a special exception permit in any land use category.
 - c. Churches, residence(s) subject to density restrictions, cemeteries, historic uses, recreation facilities, communication towers per Section 5800.A., forest management residences.
- (Ord # 2006-020, 8-29-06)
2. Certain Special Exception uses are permitted in the Agricultural land use categories. These Special Exception uses are permitted on a case-by-case scenario basis and require special exception permitting by the Board of County Commissioners.
 - a. Pinhooking
 - b. RV Parks and Campgrounds in AG-3 land use.

- c. Neighborhood Commercial Overlay uses
- d. essential utility services (see Comp Plan Policy 1.11.2)
- e. Wholesale operations involving breeding of animals for pets are considered commercial uses of agricultural property and require special exception permitting by the Planning Commission and the Board of County Commissioners.

(Ord # 2006-020, 8-29-06)

- 3. Other Special Exception Uses, such as pinhooking as considered appropriate by the Board of County Commissioners.

(Ord # 1999-002, 8-17-99)

C. Neighborhood Commercial Uses.

Uses permitted in the Neighborhood Commercial overlay consist of light commercial uses or services of a convenience nature whose primary market base is the local neighborhood and whose services are intended to serve the needs of the local community. Prohibited uses include liquor stores, taverns, bars, lounges, party/dance halls or clubs selling or serving alcohol.

(Ord # 2006-020, 8-29-06; Ord # 2011-006, 10-04-11)

The types of uses in the neighborhood commercial group include land uses which serve a limited geographical area or special activity. See Subsection 5204 for a listing of the location criteria.

(Ord # 2006-020, 8-29-06)

- 1. Possible Neighborhood Commercial uses are as follows:
 - a. Small grocery (food market) /convenience store (with or without gas pumps), (2,000 maximum GSF).
 - b. Bed & Breakfast.
 - c. Barber/Beauty Shops.
 - d. Small Restaurant seating no more than 35 people.
 - e. Minor Truck/Auto Repair (no more than three repair bays).
 - f. Vegetable/fruit stands,
 - g. Civic Organizations.
 - h. Child or Adult Day Care Facilities.
 - i. Similar small scale commercial land use activities as approved by the BOCC.
 - j. Studio and artist's sales facilities associated with the Florida Art Trail are considered uses by right.
 - k. Recreational Vehicle Parks and campgrounds as a special exception use and subject to the restrictions in the Neighborhood Commercial Overlay land use (also see Section 5900).

(Ord # 2006-020, 8-29-06)

- 2. Review: All neighborhood commercial uses are considered Class II uses and are subject to review by the Planning Commission and approval as a Special Exception by the Board of County Commissioners.

(Ord # 2003-006, 8-19-03, Ord. #2011-006, 10-04-11)

3. **Sale of Alcohol:** Sales of alcohol may be permitted in the Neighborhood Commercial overlay land use upon the approval of the Board of County Commissioners as a Special Exception. The sale of alcohol may be permitted only as an accessory use to a commercial retail use or for the consumption in a restaurant use. Grandfathering of existing establishments selling alcohol for onsite or offsite consumption will not be permitted in established residential neighborhoods. All such establishments that cease to operate under continuous ownership of the current BPR licensee will sunset.

(Ord # 2003-006, 8-19-03, Ord. #2011-006, 10-04-11)

4. **Conflicts:** No permits will be issued which are known to conflict with neighborhood or property owners Covenants and Restrictions in good standing at the time of the application. Permits for housing or home occupations in areas covered by Home Owners Deed Restrictions may be held pending receipt of consent from the Home Owners Association or Property Owners Association.

(, Ord # 2003-006, 8-19-03, Ord # 2006-020, 8-29-06)

5. **Neighborhood Commercial Special Waterfront Dependent Uses - Exceptions:**

In order to preserve and enhance the County's existing commercial waterfront uses, special waterfront dependent uses may be permitted and expanded as Neighborhood Commercial uses in areas designated within established boundaries of the Wetumpka – Lake Talquin Area Plan when defined and adopted.

Special waterfront dependent uses, include but are not limited to:

- a. Historically existing restaurants,
- b. Recreational vehicle parks,
- c. Bait and tackle shops,
- d. Marinas; and,
- e. Convenience stores.

(Ord #2011-006, 10-04-11)

D. Commercial Uses.

Class I Commercial Uses

Class I Commercial land use activities include a wide variety of general commercial, recreational, entertainment and related activities. Examples include the professional and office uses listed in Subsection 4202.E., as well as the following types of commercial uses. The below listed land use activities are not an exhaustive list of commercial activities, although are representative of the Class I General Commercial uses allowed by this Code. Class I, General Commercial uses are considered uses by right, with proper planning controls in all areas designated as Commercial or Light Industrial on the Future Land Use Map. The Planning Commission and Board of County Commissioners will receive status reports of all Class I General Commercial applications in the monthly planning report.

(Ord # 2003-006, 8-19-03)

1. Grocery stores, super markets and specialty food stores and bakeries, (< 20,000SF)
2. Medical Walk-In clinics.
3. Hotels and motels, (<24 units)
4. Small Shopping centers, (<50,000 sf, no major magnet stores)
5. Service businesses such as blueprinting, printing, catering, tailoring, travel agencies, upholstery shops and laundries/dry cleaners.
6. Miniature golf and golf driving ranges.
7. Retail plant nurseries.
8. Veterinary offices and animal hospitals, without outside kennels.
9. Restaurants, including take-out and sit down restaurants and restaurants with out-door seating.
10. Funeral homes with or without crematories.
11. Farm and garden supplies.
12. Financial institutions with or without drive-up facilities.
13. Motor vehicle sales, utility trailer sales, rental, service and repair, including truck stops, body shops, road services and car wash facilities.
14. Gasoline sales and service and the combination of gasoline sales and food marts and similar functions.
15. Roadside fruit, produce sales and fireworks stands. All fireworks stands must be inspected by the authority having jurisdiction for inspections.
16. Other commercial land use activities as determined to be Class I by the Planning Director, has minimal offsite impacts and would not be considered to be a nuisance to adjacent properties.

(Ord # 2003-096, 8-19-03) (Ord # 2006-020, 8-29-06)

Class II Commercial uses.

Class II, General Commercial land use activities include those activities which require outdoor storage, have higher trip generation rates and/or the potential for greater nuisance to adjacent properties than Class I, General Commercial land use activities. Class II General Commercial land use activities are considered Special Exception uses and require review by the Planning Commission and approval by the Board of County Commissioners. (Ord # 2003-006, 8-19-03)

1. Recreational vehicle parks and travel trailer parks (see Subsection 5900), mobile home parks. This does not include mobile home sales.
2. Truck Stops and fuel facilities with more than 6 fueling stations.
3. Taverns, bars, lounges, night clubs, restaurants with alcoholic beverage sales, and dance halls.
4. Outdoor flea markets, and other similar markets.
5. Veterinary offices and animal hospitals, with outside kennels.
6. Civic and Fraternal organizations.
7. Light industrial uses with no off-site impacts that are primarily oriented towards enclosed manufacturing, redistribution, assembly and warehousing. This includes self storage facilities over 10,000sf GFA.
8. Theaters and auditoriums.
9. Circuses, fairs and carnivals.

10. Other land use activities as determined to be Class II.
11. Childcare / Daycare facilities
12. Adult Daycare and Adult Congregate Living Facilities (ACLFs) with more than six clients. See Subsection 5105.B. and Subsection 2102, Special Residential Uses. (ORD.#2006-020, 8-29-06)

(Ord # 2003-006, 8-19-03) (Ord # 2006-020, 8-29-06)

E. Professional Service and Office Uses. (Ord # 2003-006, 8-19-03)

This group of uses includes business and professional offices, medical offices or clinics, government offices, financial institutions and personal service businesses where service is performed on an individual to individual basis as opposed to services which are performed on objects or personal property. Examples of personal businesses are barber shops, beauty shops, copying and reproduction services. This group of uses may include a dispatching/ communications/office center for the distribution of goods, but specifically excludes the warehousing or actual distribution of goods. This category also includes veterinary offices and animal hospitals, without outside kennels. Office buildings over two stories or 10,000 square feet shall be considered under Type II review.

(Ord. # 1999-002, 8-17-99)

F. Light Industrial Uses.

This type of use is primarily directed at high-tech, light industrial low polluting uses. The targeted uses shall have a low level of impact to the natural and the built environment. These uses may have minor daytime offsite impacts that will have little effect on neighboring sites. These uses may include mobile homes sales lots, light manufacturing, assembly, warehousing, operations centers, parking of fleet vehicles for equipment that require ten wheels or less and minor outdoor storage of palleted stock materials in opaque enclosures. Light Industrial uses are Class I uses that do not require the emission of any substances in the environment, (this does not include waste water omissions which are properly permitted and operating-) have minimal sight and noise impacts and are considered uses by right in a Light Industrial area.

(Ord # 2003-006, 8-19-03)

Allowable uses.

1. Building supply, including retail sales of lumber, agricultural supplies and machinery sales.
2. Laboratories, indoor research and development facilities.
3. Mobile home and recreational vehicle sales.
4. Warehouses, including buildings for commercial storage of personal property not used for commercial uses.
5. Printing, publishing and allied printing.
6. The manufacturing of electrical and electronic equipment, machinery and related supplies.
7. Assembly of minor components into larger assemblies or finished products, and the manufacture of finished products from sub-assemblies, components or raw materials.

8. Central facilities for service companies requiring the parking of fleet vehicles with ten wheels or less.
9. The manufacturing of apparel and other finished products made from fabrics and similar materials, other than fiberglass products.
10. The manufacturing of measuring, analyzing and control instruments, photographic, medical, and optical goods, watches and clocks.
11. The manufacturing of computers, related components and communications equipment.
12. Central plant locations for dry cleaners.
13. Auxiliary service uses which support the needs of businesses and employees in a light industrial context such as drive through banking, restaurants, commercial service providers, and retail gasoline stores with convenience stores.
14. Flea Markets with closeable bay doors on vendor stalls.

(Ord # 1999-002, 8-17-99)

In addition, certain Class I Commercial uses may locate in Light Industrial areas to provide goods and services to those employed in or near the Industrial zone. These uses are;

1. Grocery stores, super markets and specialty food stores and bakeries, (< 20,000SF)
2. Medical Walk-In clinics.
3. Hotels, motels, (<24 units)
4. Service businesses such as blueprinting, printing, catering, tailoring, travel agencies, upholstery shops and laundries/dry cleaners.
5. Veterinary offices and animal hospitals without outside kennels.
6. Restaurants, including take-out and sit down restaurants and restaurants with out-door seating.
7. Funeral homes with or without crematories.
8. Financial institutions with or without drive-up facilities.
9. Gasoline sales and service and the combination of gasoline sales and food marts and similar functions.
10. Other commercial uses may locate in Light Industrial areas as Type II review applications with the required public hearings.

(Ord # 2003-006, 8-19-03)

(G) Industrial Uses.

Industrial uses generally have more significant off-site impacts than Light Industrial. These uses generally require large areas to attenuate impacts associated with the development and operation of the uses. This type of use often requires open storage for vehicles associated with the transportation of products, goods and services such as interstate tractor haulers, tankers, trailers etc with twelve (12) to eighteen (18) wheels. The outside storage of large inventories, such as sub-assemblies or finished products, trailers, houses and mineral resources (including Attapulgitic or fuller's earth or limestone products), shall be included in this category. Manufacturing uses with outdoor processing areas such as concrete or asphalt batch plants or lumber milling operations are considered Industrial. Commercial pressurized propane gas storage and solid bulk transfer stations are allowed, but storage and bulk transfer of

liquid petroleum products, other than LPG, is prohibited. Land uses which provide the daily convenience goods and services of persons who work in industrial areas are considered as special exemption uses. All applications for development in Industrial Areas that are not already governed by DRI approvals shall be considered as Class II applications and will require Board of County Commissioners approval.

(Ord. # 1999-002, 8-17-99)

H. Recreational use.

These uses include areas for outdoor activities, such as picnicking, jogging, cycling, arboretums, hiking and nature trails and natural history tours, golf courses, play grounds, ball fields, outdoor ball courts, stables, outdoor swimming pools (public and private) and water related or water dependent uses, such as boat ramps, fishing docks, hunting camps and all other similar outdoor recreational uses. Specifically excluded from this group of uses are firing ranges and gun clubs, marinas, miniature golf courses, race tracks and similar commercial recreational or quasi-recreational activities. The DRC may recommend that some applications may be reviewed as Class II applications.

(Ord. # 2003-006, 8-19-03)

I. Silviculture

Silviculture is the propagation, growth and harvesting of trees of any species for timber, chip or pulp production. The clear cut harvesting of trees on tracts planned for development on corridor roads may incur penalties in the way of reforestation or landscaping requirements at the development approval or land use amendment stage.

(Ord. # 2003-006, 8-19-03)

J. Public/Utility.

This group of activities includes those uses which provide essential or important public services, and which may have characteristics of outdoor storage or potential nuisances to adjacent properties due to noise, light glare or appearance. Government offices and government agency offices are included in this group of uses. Uses include the following and substantially similar activities, based upon similarity of characteristics. These land use activities are grouped into Class I and Class II Public Service/Utility uses.

(Ord. # 1999-002, 8-17-99)

1. Class I Uses:

Class I uses are considered uses by right, with proper planning controls.

- a. Emergency service activities such as buildings, garages, parking and/or dispatch centers for ambulances, fire, police and EMS services.
- b. All local government buildings and facilities.
- c. Additions or expansions to existing public or private schools that create less than one hundred twenty-five percent (125%) of existing classroom capacity.

(Ord. # 2003-006, 8-19-03)

2. Class II Uses:

Class II Public/Utility land use activities are considered special exception uses and require approval by the Planning Commission and the Board of County Commissioners. New public, private, or charter schools can be developed within the Type II review criteria in all residential and agricultural zones noting that site approval and construction requires a subsequent Land Use Amendment change to Public on the next scheduled submission of a Map Amendment to the Department of Community Affairs.

- a. New schools, public, private or chartered. Maintenance facilities and storage yards for schools, government agencies, telephone and cable companies.
- b. Utility facilities, such as water plants, wastewater treatment plants and their offsite disposal facilities and electricity substations, public landfills.
- c. Airports, airfields, and truck or bus terminals.
- d. Regional, state and federal government facilities.
- e. Wholesale export of water from the County packaged as bottled may be permissible as a Class II use by Special Exception.
- f. Export by pipeline

(Ord # 2003-006, 8-19-03)

3. **Essential Services:**

The County may permit essential services by special exception and with planning controls in any land use category. These essential services are hereby defined to include and not be limited to; water, sewer, gas, telephone, television, radio, and electrical systems, (including transmission lines and substations) provided that all other requirements of the Comprehensive Plan are met.

(Ord # 2003-006, 8-19-03)

K. Institutional Uses

1. **Class I Institutional Uses:**

Churches and associated cemeteries are Class II Institutional uses which are a use by right in all agricultural and residential areas. Only those activities which are associated with worship services; weddings, funerals, and similar activities relating to the normal functions of an active congregation are permitted as a use by right. Weekday educational classes, adult or child daycare services, homeless shelters, and other 'outreach' or community counseling activities are considered Class II uses and require special exception permission from the BOCC.

(Ord. # 2003-006, 8-19-03)

2. **Class II Institutional uses:**

This type of use includes educational facilities (public or private), commercial cemeteries, pre-school and day care facilities (public or private), residential care facilities, drug treatment centers, nursing homes, halfway housing and other similar institutional uses, which may be approved by the BOCC.

(Ord # 2003-006, 8-19-03)

L. Historical uses.

Sites that have been designated as having historical significance to or having historical resources important to Gadsden County. For new sites to be included in this category, a comprehensive plan amendment is a requirement. All new uses in historical structures and on lands which have been designated as Historical and are included on the Future Land Use Map as Historical must receive authorization from the Board of County Commissioners to conduct any commercial use. These commercial uses may include, Bed and Breakfast, Taverns, Inns, Hunting lodges and camps, natural history tours and associated commercial operations. Other uses may be included upon approval by the Board of County Commissioners. All re-development of historical structures and commercial operations in historical structures and properties are considered Class 2 uses and are subject to review and approval by the Board of County Commissioners. Acquisition and land use changes of lands by the County for historic resource preservation and heritage or history related activity centers have priority in the Land Use Amendment processing for the period in which they are submitted.

(Ord # 1999-002, 8-17-99)

M. Mining uses.

The types of uses in this group include any extraction activities, specifically the mining of Attapulgitte Clay, Fuller's Earth or rock mining. Included as allowable uses are the associated industrial the processing, refinement, packaging and transportation of extracted materials. Offices for such mining activities are also included in this group.

(Ord # 1999-002, 8-17-99)

N. Home Occupations.

Home Occupations are uses which are unobtrusive with minimal to no impact on the surrounding area and do not require additional employees, numerous deliveries or additional outdoor storage areas or structures.

There shall be no display of the use and no person not a resident of the premises shall be employed specifically in connection with the home occupation. No mechanical equipment shall be installed and used for the customary home occupation except that type of equipment which is normally used for domestic or professional purposes. No more than twenty-five percent (25%) of the total floor space of the structure shall be used for home occupations. Home occupations must comply with all necessary building code requirements. Home Occupations are limited to one (1) sign no greater than four (4) square feet.

(Ord # 2003-006, 8-19-03)

SECTION 4300. Allowable Land Uses in Each Land Use Category.

The following table outlines the permitted uses included in the listed land use category. Uses not listed may be permitted by special exception by the Board of County Commissioners.

TABLE 4300 Permitted Uses

LAND USE CATEGORY	PERMITTED USES
Urban Service Area Subsection 4101	Residential (5:1) with water & sewer & paved roads Residential (2:1) with water & paved roads Residential (1:1) with either central water or paved roads- Recreation Institutional Public Commercial Light Industrial Home Occupations
Rural Residential Subsection 4102	Residential (1:1) Recreation Class I Institutional Public Agriculture Silviculture Neighborhood Commercial Home Occupations
Agriculture 1 Subsection 4103	Residential (1:5) Agriculture Silviculture Class I Institutional Public Historic Neighborhood Commercial Home Occupations
Agriculture 2 Subsection 4103	Residential (1:10) Agriculture Silviculture Class I Institutional Public Historic Neighborhood Commercial Home Occupations
Agriculture 3	Residential (1:20)

Subsection 4103	Agriculture Silviculture Recreation Class I Institutional Public (Except Schools) Historic Neighborhood Commercial Home Occupations
Table 4300, Continued	
Commercial Subsection 4104	Commercial Professional/Service/Office Institutional Public
Conservation Subsection 4105	Recreation Silviculture with (BMP's)
Recreation Subsection 4106	Recreation Public
Public Subsection 4107	Public Institutional
Historic Subsection 4108	Historical Recreation Residential Agriculture Conservation Other approved uses
Light Industrial Subsection 4109	Light Industrial Class I Commercial Public
Industrial Subsection 4110	Commercial Light Industrial Industrial Public
Mining Subsection 4111	Mining Landfills

Silviculture Subsection 4112	Silviculture Residential (1:80)
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Notes:

1. Existing Silviculture and Agriculture are allowable uses in all land use categories prior to other more intense development.
2. Undeveloped lots of record in predominantly residential areas that have a commercial designation may elect for residential use.

(Ord. #. 2003-006, 8-19-03)

Position: Assistant Chief Grower - Indoor Grow and Greenhouse

Job Description:

The Assistant Chief Grower reports directly to the Chief Grower and assists in all phases of the grow process. S/he will be responsible for all aspects of the grow area (indoor or greenhouse) and for implementing the day to day standard operating procedures of the cultivation center as well as managing all the grow staff.

Responsibilities:

- Assisting with the management of a large-scale greenhouse or indoor cultivation facility
- Responsible for all grow processes, plants and staff
- Responsible for internal inventory control including weighing, recording information in the log, and tagging plants
- Assisting the Chief Grower with all the tasks in the grow including: seeding, cloning, transplanting, feeding plants, defoliation, super cropping, topping, foliar and preventative sprays, trimming, packaging, waste disposal and inventory management
- Monitoring environmental and atmospheric conditions including temperature and humidity
- Preventative maintenance and elimination of all types of mold, powdery mildew, spider mites, root aphids and fungus gnats
- Tracking and recording pesticide/fungicide use
- Managing plant scheduling and organization to project all garden needs on a daily, weekly, and monthly basis cataloguing and analyzing each individual strain
- Maintaining appropriate inventory levels

Skills/Qualifications:

- Education: Prefer a BS in a related area of agriculture (e.g. plant biology, botany, horticulture, genetics)
- Minimum of 2+ years of cannabis cultivation experience
- Knowledge of large scale commercial plant cultivation including nutrient requirements, mediums, light requirements, temperature control, air flow, etc.
- Knowledge of plant diseases, insects and fungi, as well as plant treatment options
- Physical ability and health necessary to perform manual labor tasks required for the proper management of grow warehouse

- Must be punctual, have accountability, proactive behavior and strong attention to detail

Position: Assistant Production Manager

Job Description:

The Assistant Production Manager will report to the Product Development Manager and help train the packaging staff. S/he will assist the Product Development Manager with product distribution, weighing, and inventory.

Responsibilities:

- Assist Product Development Manager with all aspects of production room management, including preparations for packaging, equipment coding, labeling, weighing, record keeping and tracking
- Enforce all safety and sanitation codes
- Train packaging staff in all packaging rules and regulations
- Assist in the oversight of production/packaging staff

Skills/Qualifications:

- Education: Bachelor's or Associate's degree
- ServSafe certification
- Prefer experience in inventory at another production facility
- Must be punctual, highly organized and a team player
- Must have leadership qualities and be able to perform under pressure
- Prefer someone with an aptitude for mechanics

Position: Bookkeeper

Job Description:

The Bookkeeper will report to the Chief Financial Officer. S/he will create financial transactions and financial reports based on transactions and reconcile accounts to ensure their accuracy.

Responsibilities:

- Maintaining records
- Preparing financial reports
- Ensuring compliance with legal requirements
- Defining and ensuring implementation of policies and procedures specific for bookkeeping
- Ensuring collection of receivables

Skills/Qualifications:

- Education: Bachelor's or Associate's degree in accounting or business administration
- Critical thinking skills, detail oriented, ability to problem solve, organizational skills
- Minimum of 3 years' experience in bookkeeping and generally accepted accounting principles
- Preference given to candidates with a working knowledge of the cannabis industry and accounting software package specific to site

Position: Cash Manager

Job Description:

The Cash Manager reports to the Bookkeeper and oversees the management of cash flow

Responsibilities:

- Ensuring compliance with all applicable laws, regulations, policies and procedures, safeguarding and managing cash, accounting for all sales and expenses

Skills/Qualifications:

- Education: High school diploma or GED certificate supplemented with courses in bookkeeping and supervisory techniques
- Minimum of three years of clerical accounting experience
- Experience in cash management (e.g. gaming, banking)
- Knowledge of bookkeeping procedures and generally accepted accounting practices as they relate to cash receipts
- Competence in using computer systems and software applications necessary to the performance of work
- Basic problem solving skills associated with software applications

Position: Chief Executive Officer—

Job Description:

The Chief Executive Officer will report to the company's principal officers. He will provide strategic direction, vision, and leadership to advance the company's objectives.

Responsibilities:

- Create and oversee the implementation of the company's vision and mission
- Develop and oversee the translation of the mission and vision into a strategic plan
- Ensure the company's strategic edge through ongoing awareness of scientific landscape and developments, legislation, market trends and consumer preferences
- Build coalitions and relationships to advance the goals of the company
- Hire key executive staff members
- Oversee the operation of the company by supervising executive staff and developing and implementing standards, controls, systems and procedures to assure the quality of the organization
- Promote programs that are cost-effective while maintaining program quality
- Manage organizational change and growth
- Represent the company to government representatives, the community and consumers
- Develop performance measures and ensure that they are met

Skills/Qualifications:

- Education: A Bachelor's or more advanced degree in business management
- Minimum of 4 years' experience in a senior management position
- Must be results oriented with demonstrated expertise in team building, problem solving, governance, community relations, and culture-building
- Must exhibit excellent oral and written communication skills to clearly and effectively relay ideas and expectations

- Ability to multitask, work in a fast-paced environment, deal well with stress, and have mediating/negotiator skills (conflict resolution).

Position: Chief Financial Officer

Job Description:

The Chief Financial Officer reports directly to the CEO and is responsible for all financial and fiscal management facets of the company as well as all human resources and inventory aspects of Mindful Medical.

Responsibilities:

- Develop financial strategies together with the CEO and stakeholders
- Responsible for all financial and fiscal management facets of the company including profit and loss, expense control, budget development, record keeping and reporting
- Assist CEO in developing and implementing strategic plan through data analysis and financial forecasting
- Improve operational efficiency by implementing processes that increase productivity
- Responsible on a day to day basis for cash flow, company liabilities, financial relationships, stakeholder relations, and regulatory relationships pertaining to finances
- Direct oversight of cash management
- Oversee purchasing and payroll
- Develop and maintain internal control systems
- Monitor company's banking activities
- Oversee human resources and the cost-effectiveness of health care coverage, business insurance plans and other fringe benefits
- Oversee inventory and the maintenance of fixed assets

Skills/Qualifications:

- Education: MBA or related degree in business, management, accounting, or finance
- Outstanding and proven leadership, team building, managerial, and communication skills
- Minimum of five years' experience in financial management and/or business development in mid to large size corporation

Position: Chief Legal Counsel

Job Description:

The Chief Legal Counsel will serve as in-house counsel to provide strategic legal advice to management; liaise between the Applicant, government agencies, and external parties; anticipate future issues while identifying solutions to diminish risk; keep abreast of changing rules and regulations.

Responsibilities:

- Manage legal staff and legal functions of the business
- Define and develop company policies and procedures
- Advise on internal and external company policies
- Hire and oversee outside counsel
- Ensure legal compliance with all laws and regulations

Skills/Qualifications:

- BS degree in Law or JD degree
- Prefer some business coursework or experience in a business environment
- High level of integrity, responsibility and professional ethics
- Excellent oral and written communication skills
- Broad legal knowledge
- Outstanding analytical skills

Position: Chief Medical Officer

Job Description:

The **Chief Medical Officer** (CMO), will work together with the CEO to guide the organization as it works with the Department and medical researchers in advancing knowledge and understanding of medical marijuana efficacy and use

Responsibilities:

-

Skills/Qualifications:

-

Position: Chief of Business Development

Job Description:

The Chief of Business Development will manage the dispensary side of the business, overseeing the Head of Dispensary Operations and the Marketing Department. He will report directly to the CEO.

Responsibilities:

- Oversee all dispensary operations including marketing, security, inventory and sales
- Assist in planning and shaping the overall business vision, goals and strategy
- Nurture outside business relationships
- Work with marketing department to identify new sales prospects
- Help drive business growth
- Develop marketing strategy

Skills/Qualifications:

- Education: Bachelor's degree, MBA or any business related Master's degree a plus
- At least five years proven success in a business development role, preferably with sales

- Proven sales track record
- Must have leadership qualities and be able to perform under pressure
- Excellent written and verbal communication skills
- Self-starter with strong organizational skills

Position: Chief of Manufacturing

Job Description:

The **Chief of Manufacturing**, will oversee the manufacturing facility and all aspects of cultivation and production as well as be responsible for maintaining the physical plant for manufacturing and dispensing. He will report directly to the CEO, and the Cultivation Manager, Product Development Manager and Inventory and Warehouse Manager will report to him.

Responsibilities:

- Assist in the planning and design of the manufacturing facility
- Oversee and coordinate all functions of cultivation and production
- Work with the compliance, quality control, and security staff to develop protocols
- Create, implement, and coordinate cultivation and production protocols
- Create and implement procedures to support standards of cleanliness, safety, and repair
- Ensure that the building meets health and safety requirements and that the facility complies with regulations

- **Skills/Qualifications:**
- Education: Bachelor's or Associate degree preferred
- 2+ years of experience in construction or facility maintenance
- Cannabis industry experience a plus
- Knowledgeable about the safe use of chemicals and cleaning materials
- Mechanical aptitude and manual dexterity
- Good communication skills

Position: Chief of Security

Job Description:

The Chief of Security reports directly to the CEO. S/he will be responsible for ensuring a safe and secure environment for every facility and for all employees, visitors, equipment, company data, inventory and products and ensure strict compliance with State of New York regulations.

Responsibilities:

- Manage security staff operations including the preparation, review, and execution of security standards, policies, and procedures; implementing and continuously reviewing site-specific security plans for each of the five Mindful Medical New York facilities
- Interview, vet, hire and train all security staff
- Establish interface and relationship with local law enforcement
- Oversee installation of all security system equipment
- Develop and implement short and long-range plans for personnel and guest safety, as well as asset protection
- Serve as the Card Access System Administrator
- Monitor and oversee the Center Monitoring Station, including camera and security system integration
- Create and implement safety protocols, including emergency preparedness plans, bomb threat plans and disaster response procedures
- Oversee all evacuation ordinance requirements, including fire and life safety teams, emergency evacuation/fire drills, safety training for employees, emergency manuals, signage, etc.
- Establish and enforce protocols for property removal, floor operations and controls, and after-hours facility access
- Respond to and provide assistance with reported medical emergencies, bomb threats, fire alarms, intrusion alarms, or elevator entrapments, following established emergency response procedures. Respond to and manage any extenuating circumstances should they arise.
- Conduct internal investigations and prepare written reports and documentation on investigative findings and processes
- Evaluate, recommend, and implement programs that continually improve security service levels
- Network with law enforcement organizations and security industry associations
- Manage and evaluate security shift supervisors, assistant supervisors, and security officers.
- Supervise and ensure compliance of training programs for security officers and supervisors
- Conduct quarterly after-hours inspections to observe security staff performance
- Coordinate and work with security vendors, including guard service and access control vendors, to manage costs associated with security and safety technology
- Provide management with quarterly reports and annual audits
- Attend building staff meetings as the representative for security

- Review shift reports, logs, and work orders on a daily basis, responding appropriately and ensuring accuracy in logging procedures
- Stay abreast of emerging trends and new developments within the security industry and implement where applicable.

Skills/Qualifications:

- Education: Bachelor's degree or Associate's degree in criminal justice preferred
- Experience in law enforcement or armed forces if possible
- At least three years' experience managing a multi-site security operation
- Proficiency in modern security technology systems, including electronic access control, central station monitoring systems and CCTV systems with digital recording
- Familiarity with cybersecurity protocols and systems
- Excellent communications and managerial skills
- Ability to respond effectively under emergency circumstances

POSITION: Compliance and Quality Control Officer

Job Description:

The Compliance and Quality Control Officer (CQC) reports directly to the Quality Assurance Officer and is responsible for maintaining the highest compliance and quality standards across all facets of the business. Through collaboration with other key leadership, the CQC shall develop, implement, and maintain all essential compliance and quality control programs and protocols. Additionally, the CQC is the primary point of contact between several outside resources including compliance consultants, legal counsel, regulatory agencies, testing laboratories, bond providers, and insurance providers.

Responsibilities:

- License, permit, and bond maintenance with the Dept. of Health, local municipalities, and other regulatory agencies
- Ensuring all company facilities and operations abide by local and State law
- Tracking developments in rule changes and legislation in an effort to maintain a proactive approach to compliance processes
- Leveraging outside resources for expertise, infraction identification, and infraction resolution
- Developing inspection schedule for cultivation facility, including detailed checklists, documentation, and rigorous follow up to confirm that all issues have been addressed
- Developing effective documentation methods of tracking unusual or unique activity
- Developing investigation and disciplinary protocols for employees suspected of operating outside of compliance standards
- Leveraging technology resources to streamline and automate compliance tracking and documentation
- Effectively interact with State and local regulators and coordinate with internal parties
- Ensuring that all security measures meet or exceed licensing requirements
- Working with key staff to implement quality control measures that guarantee adequate and safe production, uniformity of product, reliable and outstanding product quality, and safe and secure storage and distribution

Skills/Qualifications:

- Education: Minimum of a Bachelor's degree in accounting, business administration, legal studies, finance, or political science
- Outstanding and proven leadership, team building, managerial, and communication skills
- Minimum of four years' experience in quality assurance, compliance and/or business development in mid to large size corporation

Position: Cultivation Manager/Chief Grower

Job Description:

The Cultivation Manager will report to the Chief of Manufacturing and manage a large-scale cannabis production. He will develop and maintain all grow warehouse protocols and nutrient regimens and oversee a crew that will perform all tasks in the grow area. He will be responsible for maintaining a high quality grow process that will produce superior products beneficial to the patients.

Responsibilities:

- Managing a large-scale greenhouse and indoor cultivation facility
- Responsible for all grow processes, plants and staff
- Maintaining company strategic advantage through continuous research and familiarity with the newest techniques and developments in the industry
- Hiring and training grow staff
- Supervising all the tasks in the grow including: seeding, cloning, transplanting, feeding plants, defoliation, super cropping, topping, flushing, foliar and preventative sprays, trimming, packaging, waste disposal and inventory management.
- Developing and/or maintaining grow-house protocols and nutrient regimens.
- Supervising environmental factors including temperature and humidity
- Supervising preventative maintenance and elimination of all types of mold, powdery mildew, spider mites, root aphids and fungus gnats
- Managing plant scheduling and organization to project all garden needs on a daily, weekly, and monthly basis cataloguing and analyzing each individual strain
- Assisting government auditors with inventory, sales and compliance audits.
- Maintaining company strategic advantage by continued familiarity with the newest techniques and developments in the industry

Skills/Qualifications:

- Education: Prefer a BS in a related area of agriculture (e.g. plant biology, botany, horticulture, genetics)
- Minimum of 5+ years of comprehensive cannabis cultivation experience

- Must have immense knowledge of plant biology, the cannabis plant, plant genetics and industrial agriculture
- Must have at least two years of commercial grow experience as a Cultivation Manager
- Knowledge of large scale commercial plant cultivation including nutrient requirements, mediums, light requirements, temperature control, air flow, etc.
- Knowledge of plant diseases, insects and fungi, as well as plant treatment options
- Physical ability and health necessary to perform manual labor tasks required for the proper management of grow warehouse
- Must have accountability, proactive behavior and strong attention to detail

Position: Extraction Technician

Job Description:

The Extraction Technician reports to the Product Development Manager and is responsible for operating extraction equipment and preparing samples for process control.

Responsibilities:

- Routine maintenance of extraction equipment
- Prepare samples for process control
- Collaboration with production team to ensure consistent extract supply to production area

Skills/Qualifications:

- Minimally an Associate's degree, but preferable a Bachelor's degree in either chemical or a related field
- 1- 3 years' experience working in food science, pharmaceutical, chemical or related area
- Prefer some experience optimizing extraction equipment
- Hands-on problem solving

Position: Facility Maintenance Worker

Job Description:

The Facility Maintenance Worker will report to the Chief of Manufacturing and will perform maintenance service and repairs in the areas of plumbing, carpentry, painting, plastering, and machine and electrical servicing for the organization's facilities.

Responsibilities:

- Repair and maintain facility in optimum condition
- Conduct building inspections on a daily, weekly, and monthly schedule
- Troubleshoot minor maintenance problems
- Perform preventive building maintenance
- Perform routine plumbing, electrical and hardware repairs
- Purchase necessary equipment and supplies

Skills/Qualifications:

- Education: High School diploma or GED
- Minimum of one years' experience in construction or facilities maintenance
- Knowledge of building maintenance and repair
- Knowledge of machinery, equipment and tools
- Knowledge of safety practices, precautions, and occupational hazards
- Ability to read blueprints
- Ability to communicate effectively
- Skilled in the use of hand and power tools

Position: Growers (Indoor Grow and Greenhouse)

Job Description:

Growers will report to their respective managers in the greenhouse and indoor grow. They will maintain the plants and perform all grow functions.

Responsibilities:

- Cloning, plant maintenance, plant inspections, tagging/tracking plants
- Maintaining sanitary standards
- Checking and maintaining room conditions (e.g. humidity, temperature)
- Checking and maintaining fertigator

Position: Trimmers (Indoor Grow and Greenhouse)

Job Description

Trimmers will report to their respective managers in the greenhouse and indoor grow. They will perform the plant manicuring operations including hand and machine trimming and plant manicuring.

Responsibilities:

- Hand trim leaves from cannabis plants
- Operate a trimming machine to remove leaves from cannabis plants
- Manicure plants to encourage better growth

Skills/Qualifications for Growers and Trimmers:

- Education: Prefer an Associate's degree
- ServSafe certification
- Familiarity with the different strains of cannabis
- Prefer experience in cannabis cultivation or other commercial/industrial agriculture experience
- Must be punctual, detail oriented and a team player
- Must be able to lift heavy loads
- Must maintain a clean and orderly environment
- Prefer someone with an aptitude for mechanics
- Be able to work quickly and efficiently and in a team environment
- Comply with all HR and State rules and regulations including confidentiality and non-disclosure

Position: Head of Inventory Management

Job Description:

The Head of Inventory Management will report to the Chief Financial Officer. S/he will be in charge of inventory across all systems and facilities at Mindful Medical, including raw materials, products, purchasing and orders.

Responsibilities:

- Day to day accountability for inventory across all systems and facilities
- Purchasing and ordering of all raw materials for all facilities
- Strong interface with Quality Assurance and Security to ensure that there is no theft or diversion of marijuana or medical marijuana products

- Regular audits and report to DOH, including access to the State-approved Seed to Sale system

Skills/Qualifications:

- Education: Preferably a BA degree in a business related area
- Organization and time management skills

Position: Human Resources

Job Description/ Responsibilities:

Human Resources reports to the Chief Financial Officer. S/he is responsible for maintaining employee files, orienting new employees, providing proactive support and direction to the management team on HR policies, procedures, and employee benefits. S/he develops and maintains policies and procedures and updates them as required and assists employees with issues relating to fringe benefits.

Skills/Qualifications:

- Education: Minimum high school diploma or GED, Associate or Bachelor's degree preferred
- Minimum 5 years' administrative experience at executive level
- Proficient in Microsoft Office
- Able to multi-task and work in a fast paced environment
- Good problem solving skills
- Solid commitment to customer and employee service
- Interpersonal skills

POSITION: Information Technology & Cyber Security Officer

Job Description:

Establish and maintain all technology and security apparatus, including hardware and software to meet NYS requirements to adopt and maintain security, tracking, recordkeeping, record retention and surveillance systems for: the cultivation, manufacturing, sale, delivery, transportation, distribution, or dispensing of approved medical marijuana products by the Applicant.

Responsibilities:

- Develop and implement specific measures for the protection of all electronic data throughout the company and its facilities; measures will prevent unauthorized access to data, prevent loss or theft of data and allow for the recovery of lost or stolen data;
- Design and implement measures and procedures to protect the privacy of certified patient, designated caregiver, employee and partner medical and personal information;
- After consultation with, and obtaining written approval from, the CEO, purchase all necessary and appropriate hardware (e.g. computers, back-up systems, back-up power sources and networking equipment), and services (e.g. Internet, secure Wi-Fi, anti-virus, firewall and cloud services), for the manufacturing facility and four dispensaries;
- Install hardware and provide a state of the art, secure networking system that offers industry standards of high security protection against loss, theft or diversion of product or corruption of information;
- Secure and encrypt systems as appropriate and supervise the use of access controls, including passwords, PINS, biometrics, encryption and two-factor authentication;
- Implement a business continuity and IT disaster recovery framework;
- Watch and learn from the webinar training, as well as any other training to be developed
- Develop detailed knowledge and understanding of the three main technical components of the Medical Marijuana Program (MMP): The Medical Marijuana Tracking and Management Solution; The Medical Marijuana Module in the existing NYS Clinical Laboratory Information Management System (CLIMS); The Seed to Sale Tracking Solution;
- Set up the technical components at each facility and enable all hardware and related software to work securely and seamlessly;
- Train staff in the use of the technical components and all security-related policies, protocols and procedures, including physical, data and network breach occurrence or incident protocols; provide ongoing training, as needed, both in groups and on an individual basis;
- Interface with the software developers and/or the NYS DOH through their help desk protocol to be developed, to troubleshoot problems or issues with the software; and
- Be available for off-hour emergency calls.

Skills/Qualifications:

- Five years of experience working with information security, preferred; Professional certification preferred (CISSP, CISM, CISA, CRISC, or other information security credentials);
- Knowledge of firewalls, intrusion detection/intrusion prevention systems, anti-virus, remote access systems, network zoning, centralized monitoring, and application scanning;
- Knowledge of cyber security and risk control frameworks such as COBIT, ISO 27001, ITIL, and ISO 31000 preferred;
- Knowledge of business continuity and IT disaster recovery frameworks such as ISO 22301 and ISO 27031 preferred;
- Ability to build strong relationships with company stakeholders, including executives and vendors; and
- Proven integrity and the ability to handle confidential matters in a professional and mature manner.

Position: Inventory and Warehouse Manager

Job Description:

The Inventory and Warehouse Manager reports to the Chief of Manufacturing. S/he is responsible for assisting in a variety of warehouse duties, including shipping and receiving, unloading and loading trucks, fulfilling purchase orders, tracking products and keeping warehouse stocked with essential equipment.

Responsibilities:

- Receive and unload trucks
- Oversee the stocking of the warehouse with tools
- Ensure machinery is serviced and functional
- Maintain computerized database of inventory
- Match and process purchase and sales orders
- Fulfill customer orders
- Oversee ship
- Fill requisitions, work orders, or requests for materials, tools, or other stock items
- Follow all safety codes
- Record amounts of materials or items received
- Sort material
- Identify damage, loss, or surplus of goods and materials stored in the warehouse
- Maintain records of all activities and processes pertaining to the warehouse
- Liaise with customers, suppliers and transport companies

- Plan, coordinate and monitor the receipt and dispatch of materials
- Plan for efficient utilization of space and future requirements
- Maintain standards of health, safety, hygiene and security

Skills/Qualifications:

- Prefer a Bachelor's degree in a business management related area
- Excellent computer skills including excel and database applications
- Leadership and team building skills
- Organizational and time management skills

Position: Laborers

Job Description:

Laborers will report to their respective Assistant Chief Grower or Assistant Production Manager. They will assist in manual labor wherever required.

Responsibilities:

- Maintaining sanitary standards
- Assist wherever needed (clean, empty garbage, etc.)

Skills/Qualifications for Growers and Trimmers:

- Education: High School diploma or GED
- Prefer cannabis experience
- Any construction experience is a plus
- ServSafe certification
- Familiarity with the different strains of cannabis
- Prefer experience in cannabis cultivation or other commercial/industrial agriculture experience
- Must be punctual, detail oriented and a team player
- Must be able to lift heavy loads
- Must maintain a clean and orderly environment
- Prefer someone with an aptitude for mechanics
- Be able to work quickly and efficiently and in a team environment
- Comply with all HR and State rules and regulations including confidentiality and non-disclosure

Position: Product Assemblers

Job Description:

The Product Assembler staff will report to the Assistant Production Manager. They will perform all tasks relating to product distribution, packaging, weighing, and inventory.

Responsibilities:

- Production room activities, including preparations for packaging, equipment coding, labeling, weighing, record keeping, tracking, and packaging
- Using all machinery relating to these activities
- Complying with all packaging and sanitation rules and regulations

Skills/Qualifications:

- Education: Bachelor's or Associate's degree
- ServSafe certification
- Prefer experience in inventory at another production facility
- Must be punctual and a team player
- Prefer someone with an aptitude for mechanics

Position: Product Development Manager

Job Description:

The Product Development Manager reports to the Chief of Manufacturing. S/he will optimize existing products, maintain the inventory levels required at the cultivation center, track dry weights of all products and maintain high quality of product at all times.

Responsibilities:

- Oversee bulk and direct packaging and distribution
- Maintain inventory levels
- Track dry weights of all products
- Create a paper trail of all weighing activities
- Coordinate efficient and cost-effective inventory seed to sale system with grow staff
- Track inventory weekly, including planting, harvesting, weighing and plant destruction
- Weekly audits of products in house and daily observance of store inventories
- Communicate with vendors to keep supplies steady
- Prepare supplies, such as packing materials, for delivery to dispensaries
- Must communicate with grow area to keep track of number of plants available
- Must be aware of any changes or incorrectly entered data and follow proper procedures to correct errors
- Maintain a clean and organized facility
- Properly maintain the security of the production area by ensuring adherence to safety and security protocols
- Maintain contact with upper management numerous times during the week to ensure that all processes are running smoothly
- Ensure that all travel manifests are properly filled out and stored

Skills/Qualifications:

- Education: Bachelor's degree in management or related business area preferred
- Minimum of 2 years' management experience
- ServSafe certification
- Excellent communication and team building skills
- Keen eye for detail

Position: Quality Assurance Officer

Job Description:

The Quality Assurance Officer will be responsible for all regulatory compliance and quality control and will report directly to the CEO. He will be expected to develop, implement and maintain robust, system-wide compliance programs and work with the Department of Health to maintain highest compliance levels.

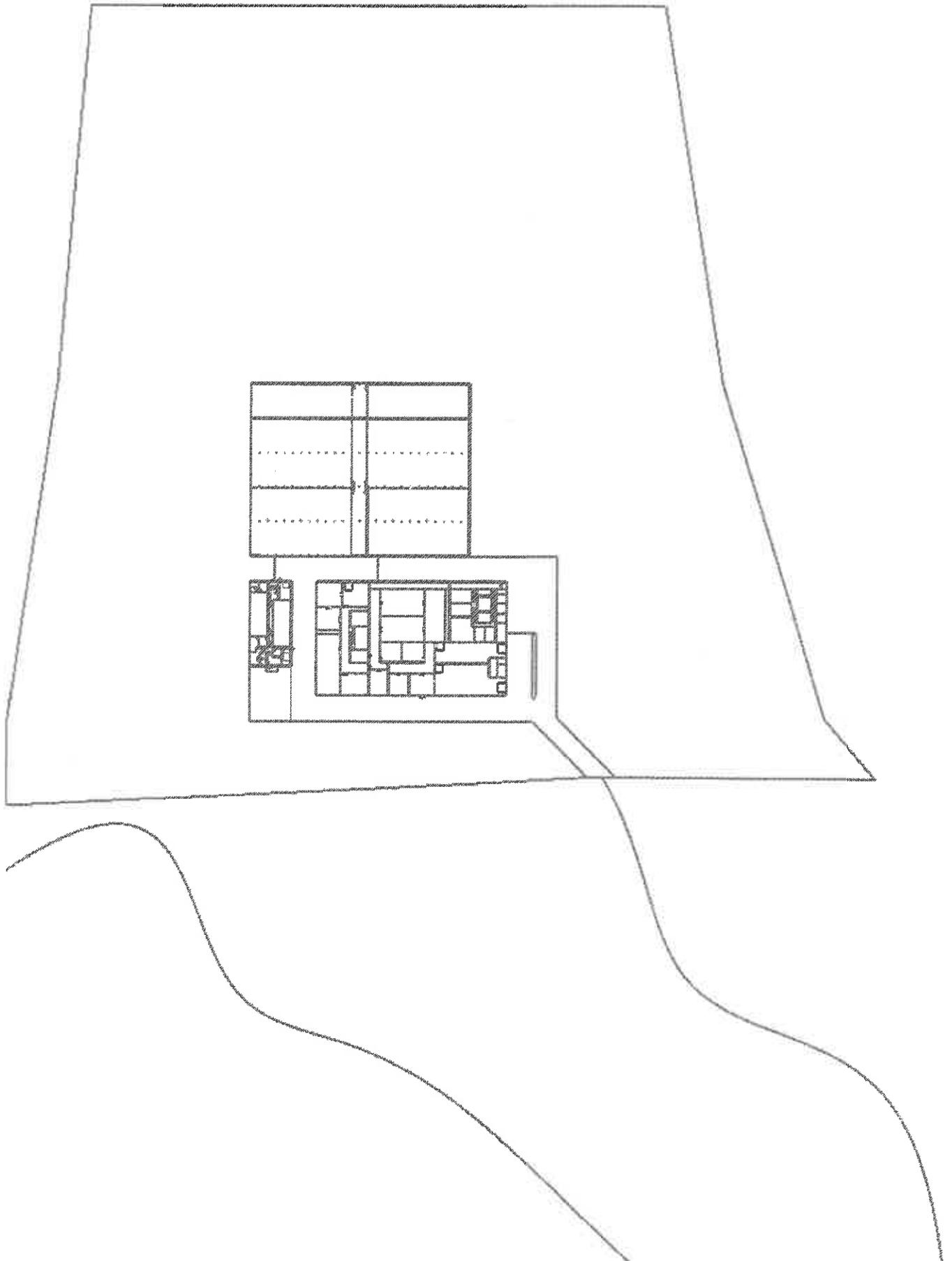
Responsibilities:

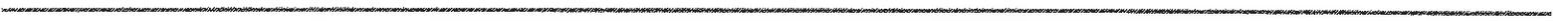
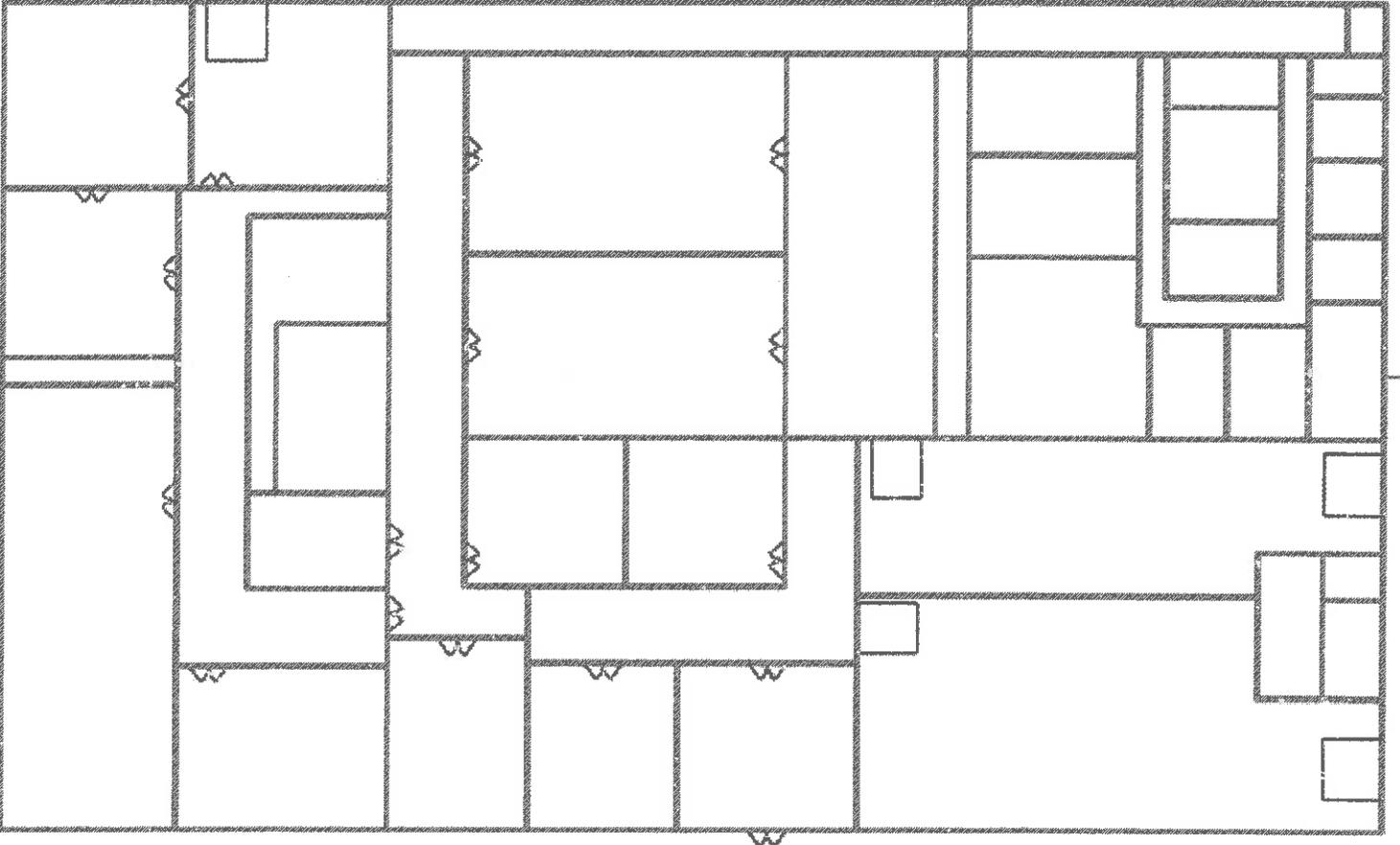
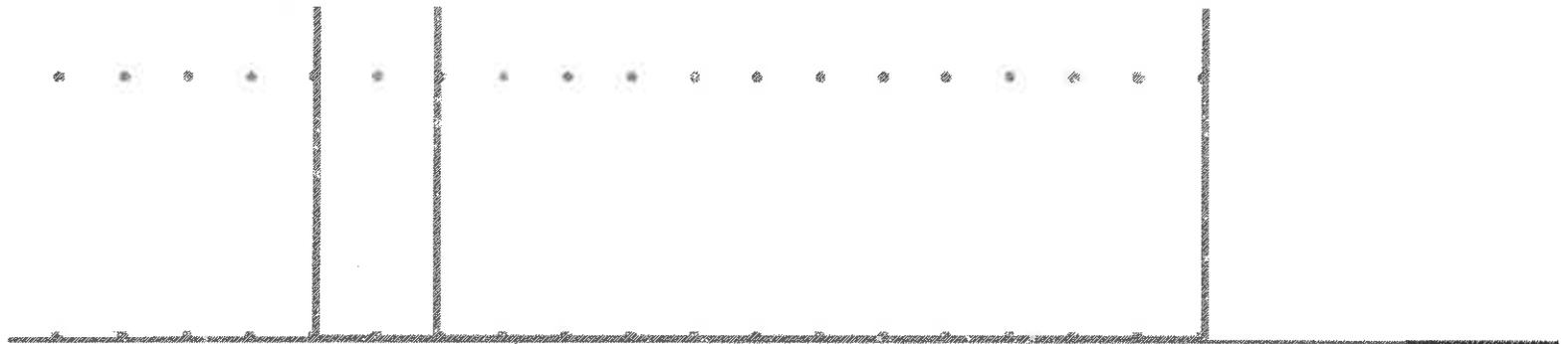
- Writing, creating and implementing standard operating procedures
- Establishing standards for quality, product testing, and take part in strategic development
- Engaging in and staying current with regulatory research
- Coordinating third party laboratory analysis
- Ensuring that products meet all regulatory standards

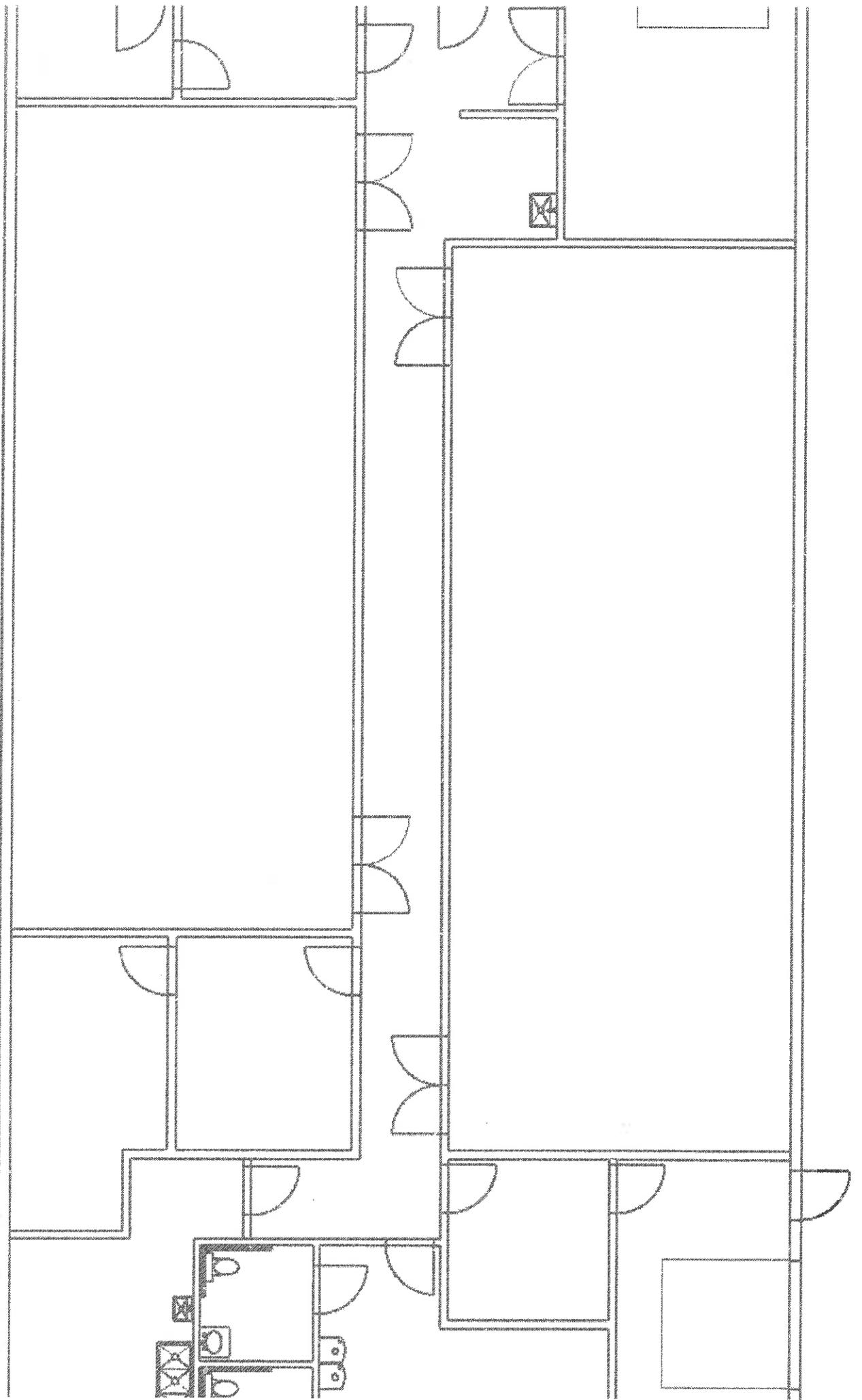
Skills/Qualifications:

- A Master's or PhD in a related area of science or agriculture (e.g. plant biology, botany, chemistry, food science)
- Has a minimum of 3+ years of related experience
- Quality control background with lab experience and familiarity with food testing protocols and Good Agricultural Practices (GAPs)
- Experience with product recalls and required technologies
- Must have accountability, be proactive and exhibit strong attention to detail

Part 5A
Attach 4







Part 3A
Attach 5

Emergency Action Plan

EMERGENCY ACTION PLAN

for

Facility Name: North Florida Group

EMERGENCY PERSONNEL NAMES AND PHONE NUMBERS

DESIGNATED RESPONSIBLE OFFICIAL (Highest Ranking Manager at

_____ site, such as _____, _____, or _____):

Name: _____ Phone: (_____)

EMERGENCY COORDINATOR:

Name: _____ Phone: (_____)

AREA/FLOOR MONITORS (If applicable):

Area/Floor: _____ Name: _____ Phone: (_____)

Area/Floor: _____ Name: _____ Phone: (_____)

ASSISTANTS TO PHYSICALLY CHALLENGED (If applicable):

Name: _____ Phone: (_____)

Name: _____ Phone: (_____)

Date ____/____/____

EVACUATION ROUTES

- Evacuation route maps have been posted in each work area. The following information is marked on evacuation maps:
 1. Emergency exits
 2. Primary and secondary evacuation routes
 3. Locations of fire extinguishers
 4. Fire alarm pull stations' location
 - a. Assembly points

- Site personnel should know at least two evacuation routes.

EMERGENCY PHONE NUMBERS

FIRE DEPARTMENT: _____

PARAMEDICS: _____

AMBULANCE: _____

POLICE: _____

FEDERAL PROTECTIVE SERVICE: _____

SECURITY (If applicable): _____

BUILDING MANAGER (If applicable): _____

UTILITY COMPANY EMERGENCY CONTACTS

(Specify name of the company, phone number and point of contact)

ELECTRIC: _____

WATER: _____

GAS (if applicable): _____

TELEPHONE COMPANY: _____

Date: ___/___/___

EMERGENCY REPORTING AND EVACUATION PROCEDURES

Types of emergencies to be reported by site personnel are:

- MEDICAL
- FIRE
- SEVERE WEATHER
- BOMB THREAT
- CHEMICAL SPILL
- STRUCTURE CLIMBING/DESCENDING
- EXTENDED POWER LOSS
- OTHER (specify) _____
(e.g., terrorist attack/hostage taking)

MEDICAL EMERGENCY

- Call medical emergency phone number (check applicable):

- Paramedics
- Ambulance
- Fire Department
- Other

Provide the following information:

- Nature of medical emergency,
 - Location of the emergency (address, building, room number),
and
 - Your name and phone number from which you are calling.
- Do not move victim unless absolutely necessary.
 - Call the following personnel trained in CPR and First Aid to provide the required assistance prior to the arrival of the professional medical help:

Name: _____ Phone: _____

Name: _____ Phone: _____

- If personnel trained in First Aid are not available, as a minimum, attempt to provide the following assistance:
 1. Stop the bleeding with firm pressure on the wounds (note: avoid contact with blood or other bodily fluids).
 2. Clear the air passages using the Heimlich Maneuver in case of choking.
- In case of rendering assistance to personnel exposed to hazardous materials, consult the Material Safety Data Sheet (MSDS) and wear the appropriate personal protective equipment. Attempt first aid ONLY if trained and qualified.

Date ___/___/___

FIRE EMERGENCY

When fire is discovered:

- Activate the nearest fire alarm (if installed)
- Notify the local Fire Department by calling _____
- If the fire alarm is not available, notify the site personnel about the fire emergency by the following means (check applicable):

- | | |
|--|--|
| <input type="checkbox"/> Voice | <input type="checkbox"/> Radio |
| <input type="checkbox"/> Communication | <input type="checkbox"/> Other (specify) |
| <input type="checkbox"/> Phone Paging | |

Fight the fire ONLY if:

- The Fire Department has been notified.
- The fire is small and is not spreading to other areas.
- Escaping the area is possible by backing up to the nearest exit.
- The fire extinguisher is in working condition and personnel are trained to use it.

Upon being notified about the fire emergency, occupants must:

- Leave the building using the designated escape routes.
- Assemble in the designated area (specify location):
- Remain outside until the competent authority (Designated Official or designee) announces that it is safe to reenter.

Designated Official, Emergency Coordinator or supervisors must (underline one):

- Disconnect utilities and equipment unless doing so jeopardizes his/her safety.
- Coordinate an orderly evacuation of personnel.
- Perform an accurate head count of personnel reported to the designated area.
- Determine a rescue method to locate missing personnel.
- Provide the Fire Department personnel with the necessary information about the facility.
- Perform assessment and coordinate weather forecast office emergency closing procedures

Area/Floor Monitors must:

- Ensure that all employees have evacuated the area/floor.
- Report any problems to the Emergency Coordinator at the assembly area.

Assistants to Physically Challenged should:

- Assist all physically challenged employees in emergency evacuation.

Date____/____/____

EXTENDED POWER LOSS

In the event of extended power loss to a facility certain precautionary measures should be taken depending on the geographical location and environment of the facility:

- Unnecessary electrical equipment and appliances should be turned off in the event that power restoration would surge causing damage to electronics and effecting sensitive equipment.
- Facilities with freezing temperatures should turn off and drain the following lines in the event of a long term power loss.
 - Fire sprinkler system
 - Standpipes
 - Potable water lines
 - Toilets
- Add propylene-glycol to drains to prevent traps from freezing
- Equipment that contain fluids that may freeze due to long term exposure to freezing temperatures should be moved to heated areas, drained of liquids, or provided with auxiliary heat sources.

Upon Restoration of heat and power:

- Electronic equipment should be brought up to ambient temperatures before energizing to prevent condensate from forming on circuitry.
- Fire and potable water piping should be checked for leaks from freeze damage after the heat has been restored to the facility and water turned back on.

CHEMICAL SPILL

The following are the locations of:

Spill Containment and Security Equipment: _____

Personal Protective Equipment (PPE):

MSDS: _____

When a Large Chemical Spill has occurred:

- Immediately notify the designated official and Emergency Coordinator.
- Contain the spill with available equipment (e.g., pads, booms, absorbent powder, etc.).
- Secure the area and alert other site personnel.
- Do not attempt to clean the spill unless trained to do so.
- Attend to injured personnel and call the medical emergency number, if required.
- Call a local spill cleanup company or the Fire Department (if arrangement has been made) to perform a large chemical (e.g., mercury) spill cleanup.

Name of Spill Cleanup Company: _____

Phone Number: _____

- Evacuate building as necessary

When a Small Chemical Spill has occurred:

- Notify the Emergency Coordinator and/or supervisor (select one).
- If toxic fumes are present, secure the area (with caution tapes or cones) to prevent other personnel from entering.
- Deal with the spill in accordance with the instructions described in the MSDS.
- Small spills must be handled in a safe manner, while wearing the proper PPE.
- Review the general spill cleanup procedures.

Date ___/___/___

STRUCTURE CLIMBING/DESCENDING EMERGENCIES

List structures maintained by site personnel (tower, river gauge, etc.):

No.	Structure Type	Location (address, if applicable)	Emergency Response Organization* (if available within 30-minute response time)

Emergency Response Organization(s):

Name _____ Phone Number _____

Name _____ Phone Number _____

(Attach Emergency Response Agreement if available)

* - N/A. If no Emergency Response Organization available within 30-minute response time additional personnel trained in rescue operations and equipped with rescue kit must accompany the climber(s).

TELEPHONE BOMB THREAT CHECKLIST

INSTRUCTIONS: BE CALM, BE COURTEOUS. LISTEN. DO NOT INTERRUPT THE CALLER.

YOUR NAME: _____ TIME: _____ DATE: _____

CALLER'S IDENTITY SEX: Male _____ Female _____ Adult _____ Juvenile _____ APPROXIMATE AGE: _____

ORIGIN OF CALL: Local _____ Long Distance _____ Telephone Booth _____

VOICE CHARACTERISTICS	SPEECH	LANGUAGE
<input type="checkbox"/> Loud <input type="checkbox"/> Soft <input type="checkbox"/> High Pitch <input type="checkbox"/> Deep <input type="checkbox"/> Raspy <input type="checkbox"/> Pleasant <input type="checkbox"/> Intoxicated _____ <div style="text-align: center;">Other _____</div>	<input type="checkbox"/> Fast <input type="checkbox"/> Slow <input type="checkbox"/> Distinct <input type="checkbox"/> Distorted <input type="checkbox"/> Stutter <input type="checkbox"/> Nasal <input type="checkbox"/> Slurred _____ <div style="text-align: center;">Other _____</div>	<input type="checkbox"/> Excellent <input type="checkbox"/> Good <input type="checkbox"/> Fair <input type="checkbox"/> Poor <input type="checkbox"/> Foul _____ <div style="text-align: center;">Other _____</div>
ACCENT	MANNER	BACKGROUND NOISES
<input type="checkbox"/> Local <input type="checkbox"/> Not Local <input type="checkbox"/> Foreign <input type="checkbox"/> Region <input type="checkbox"/> Race	<input type="checkbox"/> Calm <input type="checkbox"/> Angry <input type="checkbox"/> Rational <input type="checkbox"/> Irrational <input type="checkbox"/> Coherent <input type="checkbox"/> Incoherent <input type="checkbox"/> Deliberate <input type="checkbox"/> Emotional <input type="checkbox"/> Righteous <input type="checkbox"/> Laughing	<input type="checkbox"/> Factory <input type="checkbox"/> Trains <input type="checkbox"/> Machines <input type="checkbox"/> Animals <input type="checkbox"/> Music <input type="checkbox"/> Quiet <input type="checkbox"/> Office <input type="checkbox"/> Voices <input type="checkbox"/> Machines <input type="checkbox"/> Airplanes <input type="checkbox"/> Street <input type="checkbox"/> Party <input type="checkbox"/> Traffic <input type="checkbox"/> Atmosphere

BOMB FACTS

PRETEND DIFFICULTY HEARING - KEEP CALLER TALKING - IF CALLER SEEMS AGREEABLE TO FURTHER CONVERSATION, ASK QUESTIONS LIKE:

When will it go off? Certain Hour _____ Time Remaining _____

Where is it located? Building _____ Area _____

What kind of bomb? _____

What kind of package? _____

How do you know so much about the bomb? _____

What is your name and address? _____

If building is occupied, inform caller that detonation could cause injury or death.

Activate malicious call trace: Hang up phone and do not answer another line. Choose same line and dial *57 (if your phone system has this capability). Listen for the confirmation announcement and hang up.

Call Security at _____ and relay information about call.

Did the caller appear familiar with plant or building (by his/her description of the bomb location)? Write out the message in its entirety and any other comments on a separate sheet of paper and attach to this checklist.

Notify your supervisor immediately.

SEVERE WEATHER AND NATURAL DISASTERS

Tornado:

- When a warning is issued by sirens or other means, seek inside shelter. Consider the following:
 - Small interior rooms on the lowest floor and without windows,
 - Hallways on the lowest floor away from doors and windows, and
 - Rooms constructed with reinforced concrete, brick, or block with no windows.
- Stay away from outside walls and windows.
- Use arms to protect head and neck.
- Remain sheltered until the tornado threat is announced to be over.

Earthquake:

- Stay calm and await instructions from the Emergency Coordinator or the designated official.
- Keep away from overhead fixtures, windows, filing cabinets, and electrical power.
- Assist people with disabilities in finding a safe place.
- Evacuate as instructed by the Emergency Coordinator and/or the designated official.

Flood:

If indoors:

- Be ready to evacuate as directed by the Emergency Coordinator and/or the designated official.
- Follow the recommended primary or secondary evacuation routes.

If outdoors:

- Climb to high ground and stay there.
- Avoid walking or driving through flood water.
- If car stalls, abandon it immediately and climb to a higher ground.

Hurricane:

- The nature of a hurricane provides for more warning than other natural and weather disasters. A hurricane watch is issued when a hurricane becomes a threat to a coastal area. A hurricane warning is issued when hurricane winds of 74 mph or higher, or a combination of dangerously high water and rough seas, are expected in the area within 24 hours.

Once a hurricane watch has been issued:

- Stay calm and await instructions from the Emergency Coordinator or the designated official.
- Moor any boats securely, or move to a safe place if time allows.
- Continue to monitor local TV and radio stations for instructions.
- Move early out of low-lying areas or from the coast, at the request of officials.
- If you are on high ground, away from the coast and plan to stay, secure the building, moving all loose items indoors and boarding up windows and

openings.

- Collect drinking water in appropriate containers.

Once a hurricane warning has been issued:

- Be ready to evacuate as directed by the Emergency Coordinator and/or the designated official.
- Leave areas that might be affected by storm tide or stream flooding.

During a hurricane:

- Remain indoors and consider the following:
 - Small interior rooms on the lowest floor and without windows,
 - Hallways on the lowest floor away from doors and windows, and
 - Rooms constructed with reinforced concrete, brick, or block with no windows.

Blizzard:

If indoors:

- Stay calm and await instructions from the Emergency Coordinator or the designated official.
- Stay indoors!
- If there is no heat:
 - Close off unneeded rooms or areas.
 - Stuff towels or rags in cracks under doors.
 - Cover windows at night.
- Eat and drink. Food provides the body with energy and heat. Fluids prevent dehydration.
- Wear layers of loose-fitting, light-weight, warm clothing, if available.

If outdoors:

- Find a dry shelter. Cover all exposed parts of the body.
- If shelter is not available:
 - Prepare a lean-to, wind break, or snow cave for protection from the wind.
 - Build a fire for heat and to attract attention. Place rocks around the fire to absorb and reflect heat.
 - Do not eat snow. It will lower your body temperature. Melt it first.

If stranded in a car or truck:

- Stay in the vehicle!
- Run the motor about ten minutes each hour. Open the windows a little for fresh air to avoid carbon monoxide poisoning. Make sure the exhaust pipe is not blocked.
- Make yourself visible to rescuers.
 - Turn on the dome light at night when running the engine.
 - Tie a colored cloth to your antenna or door.
 - Raise the hood after the snow stops falling.
- Exercise to keep blood circulating and to keep warm.

CRITICAL OPERATIONS

During some emergency situations, it will be necessary for some specially assigned personnel to remain at the work areas to perform critical operations.

Assignments:

Work Area	Name	Job Title	Description of Assignment

- Personnel involved in critical operations may remain on the site upon the permission of the site designated official or Emergency Coordinator.
- In case emergency situation will not permit any of the personnel to remain at the facility, the designated official or other assigned personnel shall notify the appropriate _____ offices to initiate backups. This information can be obtained from the Emergency Evacuation Procedures included in the _____ Manual.

The following offices should be contacted:

Name/Location: _____

Telephone Number: _____

Name/Location: _____

Telephone Number: _____

Name/Location: _____

Telephone Number: _____

PART III-Continued

Northwest Compassionate Care, Inc.

Application for Low-THC Cannabis Dispensing Organization

B. Processing

Processing is to extract the desired components of marijuana into a marijuana concentrate and process that concentrate into vapor cartridges and oral capsules in a safe, sanitary, and professional manner.

1. Technical Ability

a. Experience with good manufacturing practices

Since its founding five years ago, Be Mindful has provided a steady, uninterrupted supply of medical marijuana products to registered dispensaries in its home state of Colorado, including four Be Mindful dispensaries located across the state. With an exemplary record of compliance and safety, Be Mindful has earned the respect and trust of government, physicians and patients alike.

b. Experience with analytical, organic chemistry, and micro-biology

NWCC has enlisted the services of Jackie Brown, to oversee the processing functions along with Be Mindful. Ms. Brown Has a Master of Education in Secondary Science and a Bachelor's Science Degree in Molecular Biology.

Attachment 1 Jackie Brown (resume)

c. Experience with analytical laboratory methods

NWCC's Medical Director, Dr. Duncan, currently supervises two medical offices with CLIA approved labs certified under the laboratory licensing unit of State of Florida for Health Care Administration. Laboratory tests focus on ABO, RH, Endocrinology, Hematology and Micrology.

Dr. Duncan, prior to entering medical school worked as an Analytical Chemist at both Olin Chemical Company and DeGussa Chemical Company. Using laboratory techniques during his tenure which are similar to what will be needed in the production of a cannabis based oil. His knowledge in this area will prove valuable in his oversight of the facility.

d. Experience with analytical laboratory quality control, including maintaining a chain of custody

NWCC's Medical Director has worked closely with local and state law enforcement over the years in cases of rape, incest and other crimes against patients in his Obstetrical and gynecology practice. He has hands on experience in chain of custody procedures having testified as an expert witness multiple cases in which chain of custody was required to insure prosecution.

A major part in the chain of custody procedures is proper documentation and minimalizing/eliminating any chance of contamination. No where is this more important than in criminal prosecution so to transition to cannabis production will be easily done.

e. Knowledge of and experience with, cannabis extraction techniques

With over 5 years industry experience, Be Mindful has perfected the operating procedures of cannabis extraction.

Attachment 2: Extraction and Processing SOP

f. Knowledge of cannabis routes of administration

Smoking cannabis produces the most immediate relief and permits the most refined control of your dosage. When cannabis is smoked, the active ingredients are deposited directly into the blood stream after being absorbed through the mucus membrane of the lung. Determining correct dosage is easier with smoked cannabis since the effects are usually felt within 30-60 seconds and develop fully within 5-15 minutes. The effects may last from 30 minutes to 3 hours. Cannabis dosage is fairly easy to manage. Take 1-2 puffs and wait 5-15 minutes in order to assess the right dosage. Take more puffs as needed. With reasonably high potency cannabis buds a small number of puffs (1-3) are generally enough. While smoking any material is not good for the lungs, the amount of cannabis you need to smoke is so small you should not be overly concerned. There are various methods of smoking cannabis that can reduce bronchial irritation while obtaining the medicinal benefits of the plant. These methods include: Hand Rolling For those that can tolerate smoking hand rolled cannabis cigarettes or joints are the most common and widely used method. Cannabis may be ground or cut and then rolled into a joint. Using natural-based chemical free rolling papers such as those derived from hemp or rice is recommended for health reasons and to avoid using tree products. Pipes Pipes can be used to avoid smoking paper and are useful when smoking small quantities.

We recommend glass pipes to prevent ingestion of possible harmful by-products from pipes made from other sources of material. Glass pipes have been found to provide a very clean burn and impart no chemicals. Water pipes Water pipes can be used to cool the temperature of the inhaled smoke. Contrary to popular belief, studies have shown that the inhaled THC content may actually be decreased by this method.

Vaporizing

Vaporizers can be used as a smokeless alternative. Cannabis vaporizers are designed to let users inhale active cannabinoids while avoiding smoke. Vaporizers work by heating the cannabis just below the point of combustion, the point at which smoke is produced. When the cannabis is

properly heated, THC and other cannabinoids are emitted in the form of a vapor. This markedly reduces the amount of irritating particulate materials that get inhaled, resulting in much less inflammation and damage to the lining of the lungs. Many patients who find smoked cannabis highly irritating report effective relief inhaling through vaporizers. Vaporizing is believed to mitigate many if not all of the negative effects of smoking. Dose is through self titration (gradually adjusting the dose of medicine until the desired effect is achieved). The procedure for vaporizing is similar to smoking. It is advised to wait a few minutes to feel the full effect before taking more.

Eating

Cannabinoids can be extracted into fat (butter or oils) and then ingested, usually in the form of baked goods or in candy-like products. When cannabis is digested, the active ingredients are metabolized in the liver before entering the blood stream. The effects of ingested cannabis may be felt within 30 minutes to 2 hours depending on metabolism and may last from 2-8 hours with the side effects being stronger than those felt by smoking. Therefore, it is more challenging to regulate the dosage. You cannot overdose on cannabis, however side effects can be intense and overwhelming. Use caution when trying edible products especially if you did not make them. Try small doses at first and give yourself a few days to figure out the correct titration.

Tea

Like other herbs, cannabis can be made into a tea. Boil the water first and pour it over the cannabis. Allowing the cannabis to steep for approximately an hour and a half will ensure extraction of the cannabinoids. The effects are similar to eating it.

Tincture

A tincture is a process of using alcohol to extract cannabinoids from the plant into a liquid form.

Tincture preparations have a similar effect as eating cannabis but the onset happens more rapidly and wears off more quickly. Tinctures may be dropped or sprayed into the mouth to be absorbed into the mucous membranes. Effects of tinctures are usually felt within 5 minutes up to 1 hour and last about 4 hours. It is recommended to start with about 3 drops of tincture, and wait an hour before increasing the dosage incrementally and as necessary. Alcohol based tinctures may also be dropped into hot water in order to let the alcohol evaporate and then ingested. Effects will be the same as they are for ingested cannabis.

Topical treatments

Cannabis can be absorbed through the skin and so it is ideal for topical ointments.

Marinol Marinol is a synthetic petrochemical analog of THC, one of the active elements found in marijuana. Some patients find it helps relieve nausea yet takes a long time to work. This product is made for ingestion, do not smoke it. It has the potential for overdose. Use only under the supervision of a doctor

g. Experience with recalls

Rigorous procedures are in place to investigate and document all returns, complaints, and adverse events, as well as recall, re-test, store and ultimately dispose of any manufactured medical marijuana products that are deemed suspect or not compliant with mandated regulations. Every complaint and return will be documented and addressed immediately. Each will be brought to the attention of the Quality Assurance Officer who will be solely responsible for investigation and resolution of the issues across all systems. S/he will maintain close communication with the Department, notifying them within 24 hours of any returns, complaints, adverse events and/or recalls.

Policy for Recalls

The Applicant will conduct a recall of a product or products in the event of: 1) A mandatory recall requested by the Department; 2) A substantiated and confirmed complaint by a customer which is verified as suspect or hazardous through testing ; 3) A voluntary recall due to defective packaging or labeling, or a product that has been identified to have a health or safety concern not specified by the Department, or 4) A failed laboratory testing that may pose a health safety concern due to microbial or other adulterations, i.e. *Microbes, Mycotoxins, Solvent Residues*.

Procedures for Return, Complaint, Adverse Event or Recalls

In order to ensure 24/7 consumer safety and trust, a toll free recall number will be clearly printed on the label of each approved medical marijuana product. Provision will be made for emergency paging of an officer in charge should there be a true emergency. Patients may also come to their individual dispensary with a return. When a patient relates a complaint or return, the reason for the action will be recorded along with the name of the patient, the date and the staff person to whom it was related. The Quality Assurance Officer will be notified immediately. S/he will debrief the patient and/or caregiver, and then consult with the certified physician and dispensing Pharmacist to determine whether the complication was due to a non-product related cause, e.g., incorrect dosage, improper administration. If a different cause is identified, it will be recorded in the complaint file. If no external cause was found, the product will be tested.

Product Re-Testing

A sample of the product will be expedited to an independent laboratory and tagged with a unique identifier for clear reference. A sample of the product will be retained for examination by the Department. If, upon retesting, the product is found to be consistent and in compliance with all State regulations and Northwest Compassionate Care specifications, the result will be noted in the records and the patient will be counseled by the dispensing Pharmacist with support of the Quality Assurance Officer, if necessary. If the product is found to be faulty, whether due to contamination, inconsistent cannaboid profile or other problem, the Department will be notified, and recall and hold procedures will be enacted immediately. Such products will be returned to the manufacturing facility and will be disposed of in a way that renders them unusable, as per below.

Recall Parameters and Procedures

Product Identification

In the event of a recall, the following information will be obtained by Site Management: product identity (lot, code date, serial number); description of defect; date; circumstances under which defect was found; evaluation of risk; production quantity; and estimated quantities of distribution. The most effective and efficient recall strategy will be determined and executed. Assessment of production quantities and amount and destinations of product shipped will be made and an immediate recall will be carried out.

All products in processor control will be placed in quarantine and proper hold procedures will be followed. Any existing material within the manufacturing facility or dispensaries will be placed on hold. If feasible, transports with recalled material will be canceled. Otherwise, the recalled products will be flagged and the receiving dispensaries will be notified that the incoming product is to be immediately quarantined.

Recall Protocols

- **NOTIFICATION** - The Quality Assurance Officer will notify the Department about complaints, adverse events and recalls within 24 hours.
- **CONDUCT TRACEABILITY PROCEDURES** - Records will be consulted to check for and reconcile any deviations or discrepancies that have occurred. All product and materials affected by this deviation may be considered potentially hazardous and will be quarantined and disposed of as mandated.
- **RECALL WINDOW** - The Quality Assurance Officer will determine if the incident is isolated to a specific lot or if there is potential for distribution among other lots, products and/or ingredients. In the event that the recall is a result of contamination, s/he will attempt to pinpoint the manufacturing juncture at which the product was adversely affected.
- **DEPTH OF RECALL** - Thorough tracing will determine how deep the recall is within the supply chain and the extent to which the recalled product was disseminated (warehouse, dispensaries, patients/ caregivers). This will be accomplished through the Product Traceability Worksheet (see below).
- **EFFECTIVENESS CHECK** - Site Management will initiate specific checks with each dispensary to confirm that proper removal of the product is carried out. This will include the reconciliation of the total amount of the recalled product received by the dispensary, the quantity sold to individual recipients, and the remainder in storage. The identity of the recipients will also be documented. All dispensaries, staff, patients and caregivers who received the faulty product will be notified immediately via phone and e-mail. A recall notification also will be posted on the Applicant's website. Recipients will be asked to confirm in writing that they were notified of the recall.
- **REPLENISHMENT AND REIMBURSEMENT** - Site Management and the Quality Assurance Officer will identify specific lots that may be available for replacement. Customers will be reimbursed for any material that cannot be replaced.
- **PRODUCT DISPOSAL** - Disposal methods will ensure that all recalled material are destroyed in a manner that renders it completely unusable and prevents further

circulation.

Quarantine Procedure

Northwest Compassionate Care will place recalled items in quarantine as mandated by the Department. A "QUARANTINE" tag will be applied to the pallet or container of the product. The "QUARANTINE" tag will include the: brand, lot number, amount of product held, reason for holding, final product disposition and the contact responsible for final disposition and date. The quarantined products will not be transported, distributed or dispensed without express approval from the Department. Product Holds that may pose a safety or cross-contamination threat will be segregated from other product in the storage bay and placed in the quarantine area. All products that are placed on hold will be reported to identify corrective actions, preventative measures and root cause.

Disposal Procedure

Northwest Compassionate Care will grind and shred all recalled or contaminated product plus waste plant material with grow medium (recycled coconut husk), rendering them unusable and unrecognizable. If not contaminated, the ground waste material will be composted and eventually used as a soil additive. If contaminated, the waste material will be disposed of in ways recommended by the Department.

h. Knowledge of, and experience with, producing cannabis products

Be Mindful has provided a steady, uninterrupted supply of medical marijuana products to registered dispensaries in its home state of Colorado, including four Be Mindful dispensaries located across the state for the last five years

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

Be Mindful is recognized in the state of Colorado as an industry leader and currently has 5 locations within Colorado.

Infrastructure

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

Medical marijuana products will be transported between the manufacturing facility and dispensary facilities in a Northwest Compassionate Care armored vehicle. Contents will be in a separate locked area, and not be visible from outside,

video surveillance and controlled by the SAS, allowing only authorized individuals to the room. All transportation will be delivered directly without any stops in between except for refueling or an emergency. The armed transportation personnel will assess the surrounding area for potential threats, to confirm the area is secure and safe for product transaction.

To prevent theft or loss of cash, the dispensary facility will only keep enough cash or currency on site to enable normal business practices without interruption. All cash will be locked within a tamperproof safe located within the safe room that has been secured to a main structure of the building. There will be random cash pick-ups from the dispensary to ensure that large amounts of cash do not remain on the premises. Cash will be picked up by the armored car service, Garda Cash Logistics, and transported directly to the company's financial institution. Cash will be brought to the armored vehicle by Be Mindful Medical's security staff directly from the cash vaults on the premises. Any discrepancies will be immediately reported to the bank's Manager, and to the Dispensary's Business Manager, who will contact the Head of Dispensary Operations.

b. Communication systems

Electronic Security Systems

The installed electronic security systems will utilize comprehensive technology and commercial grade equipment. The systems will orchestrate automatic responses between devices and communicate with security staff stationed to respond to emergency situations. The systems include

[REDACTED]

Only registered individuals will have access to facility premises; authorized visitors will enter the facility and receive a VMS prints a customized color badge. Detailed visitor information will be recorded in the Visitor Log, and available if requested by the Department. The SAS will be linked with the ACMS with continuous communication lines to the security station. The IC will allow communication within the facility and the and will only be accessible to authorized employees.

Cybersecurity

Northwest Compassionate Care LLC will have airtight protocols to ensure the privacy and security of clients, employees and partners through the security of electronic data, prevent unauthorized access, loss or theft, as well as to recover lost or stolen data. All records—financial, manufacturing, dispensary, patient, and employee records—will be maintained in electronic format. Computer software will be password protected and accessible only to authorized employees to ensure the integrity of patient records, security measures, combination numbers, passwords, and electronic and/or biometric security systems. The company network will be separate from the public Internet with strong user authentication mechanisms and enforcement systems such as firewalls and web filtering proxies, as well as the restriction of email and internet systems to be used for the company exclusively. Employees may not disclose confidential information concerning the company, its financial, operational and security data, nor any records of patients/caregivers/practitioners to any third parties during or after employment. The IT Network server and all company records and patient information will be stored in a secure locked location. All records will be preserved for five years and provided to the Department upon request.

c. Methods of mitigating odors if applicable.

The cultivation facility will be operated as a static negative pressure air environment. Meaning each exterior door and opening will have a slight amount of airflow that flows into the building rather than out of the building.

Office space, employee ingress and egress, plus loading dock bays will operate in this manner. We estimate “uncontrolled” air entering the building will represent less than 2% of total air introduced into the facility..

Makeup air deliberately introduced to the facility will be forced air with HEPA filtering including electrostatically charged air scrubbers which will filter pollen and dust particles from introduced air.

Deliberately exhausted air which makes up an estimated 98% of all exhausted air from the facility will be forced through activated charcoal filters scaled suitably for our specific application and flow rates. All air will be exhausted at roof height or approximately thirty feet in our case.

All flow rates and equipment sizing will be adjusted as we expand the facility and add various rooms into production over time.

3. Premises, Resources, Personnel

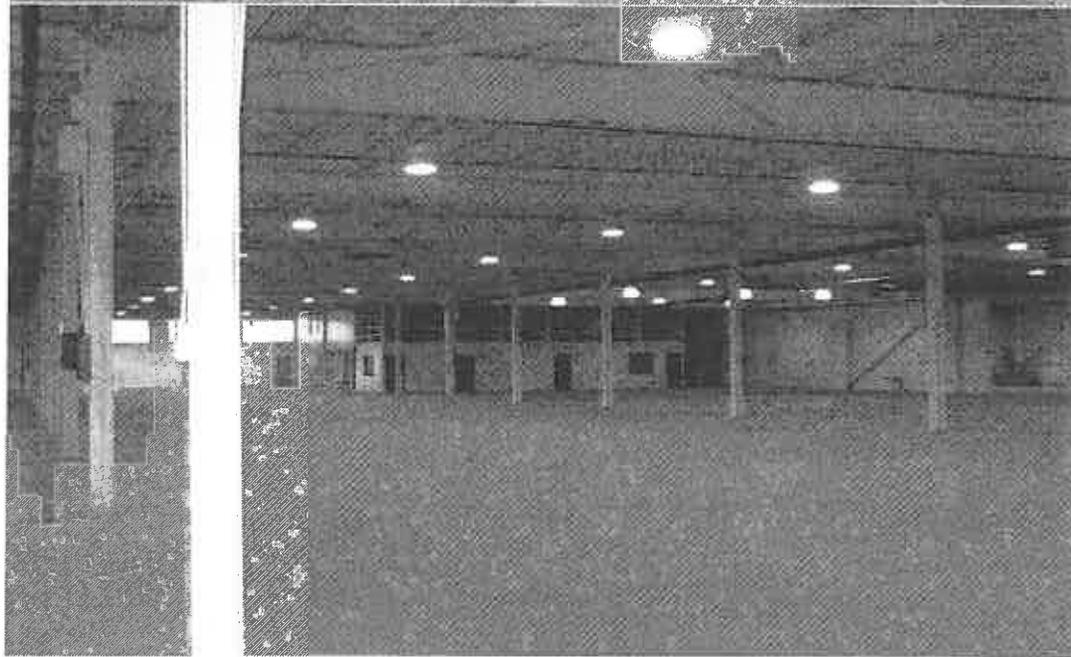
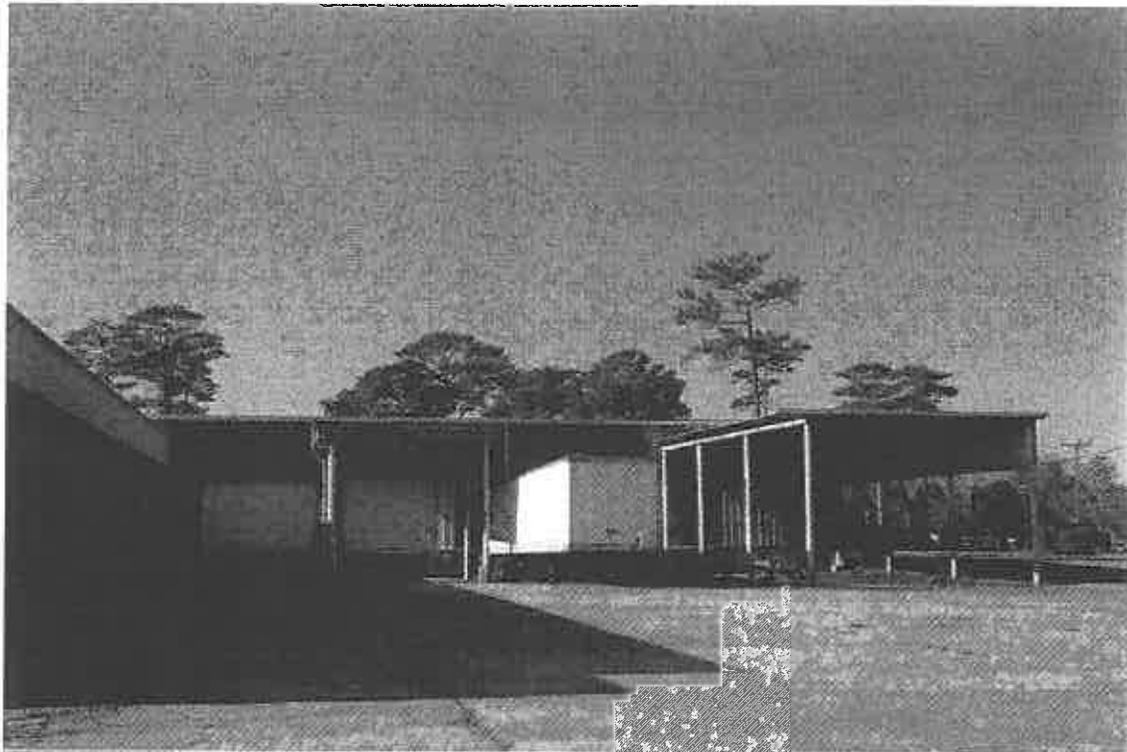
a. Location of all properties Applicant proposes to utilize to process low-THC cannabis and Derivative Products, including ownership information for the properties and any lease terms if applicable:

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.

Location of Processing property: High Bridge Road, Quincy, FL





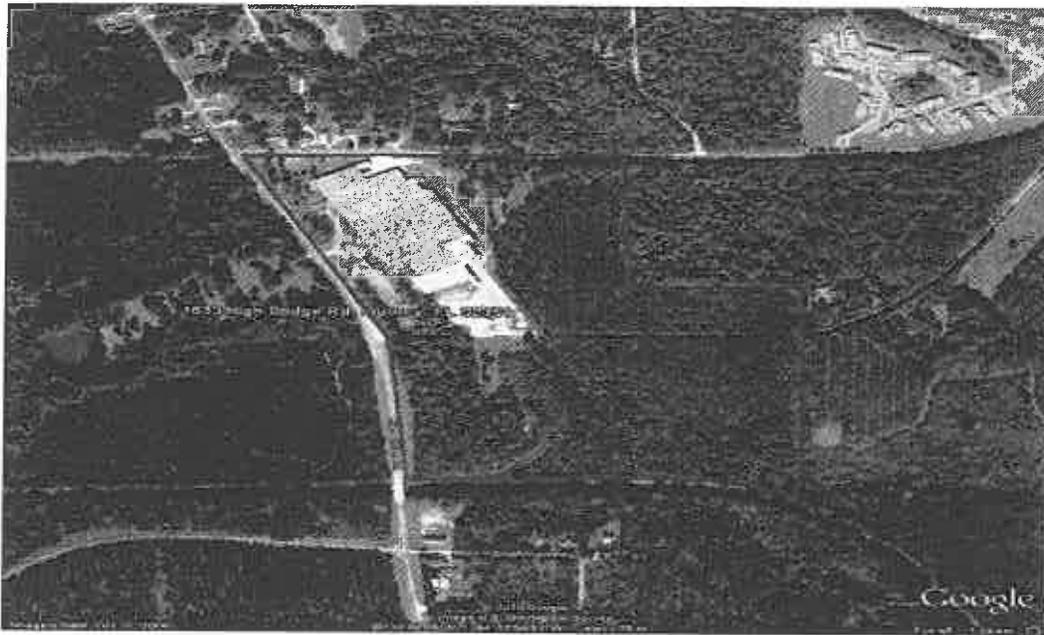
b. Compliance with local regulations regarding sanitation and waste disposal

Northwest Compassionate Care has received full approval and written support for this project from many decision makers within the community. With the property secured, and engineers, plans, and local support in place, Northwest Compassionate Care is positioned to begin operations expeditiously upon application approval.

- c. **The ability to obtain zoning approval**

Attachment 3 Land Use Categories

- 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. **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;**

NWCC will utilize a backup generator as access to for running our systems. The generator used will be Generic Backup System

Attachment 4 Generator Specs

- g. **Description of the areas proposed for the processing of Derivative Products, including the following:**

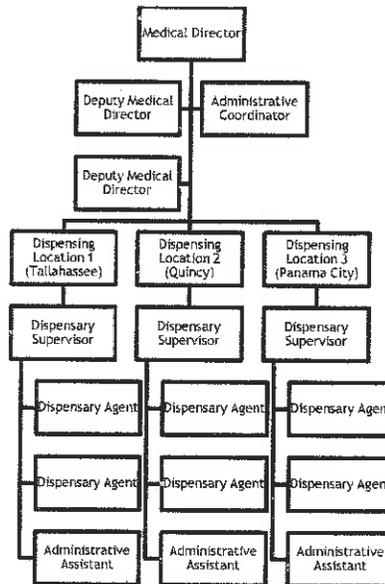
- i. Extraction equipment and location;
- ii. Concentration equipment and location;
- iii. Access to sufficient potable water and hot water;
- iv. Analytical equipment, including separators and detectors, and location;
- v. Safety equipment and facilities and location;
- vi. Computer systems and software; and
- vii. Ventilation and exhaust system.

The Extraction and Processing Department extraction process utilizes an Eden Labs commercial vacuum distiller. The devices recover and reclaim solvent for re-use. The solvent is not released into the atmosphere. These units must operate in a well-ventilated commercial environment. The International Fire Code requires a minimum of 1 cubic foot per minute (CFM) per square foot for a hazardous exhaust system.

- It is best practice is to use commercial grade extraction equipment that feature stainless steel construction and are engineered with solvent recovery.
- This is important because the solvent is recovered from the extraction process in a vapor form and then converted back into a liquid state to be recycled and reused.
- This method is environmentally friendly as it does not release dangerous vapors into the atmosphere and also adds a layer of safety as the extraction solvent is contained within the processing equipment
- Meticulous records must be kept throughout the preparation, extraction, processing, and packaging of products.
- The raw material weight, type of raw material, final product weight, product type, batch number, date, and time of processing must be recorded.
- A “Concentrate Production Worksheet” is to be completed for each batch. After production is complete, these records are to be digitized and entered in METRC or other state selected Tracking Program as mandated by local and State regulations. An example “Concentrate Production Worksheet” is available at the end of this training manual.

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.
- Cultivation Manager/Chief Grower – Manage all grow protocols, planning and purchasing
 - Assistant Chief Grower – On-site management of grow and grow staff
 - Growers – Responsible for cultivation activities
 - Laborers – Perform heavy and other manual labor where/when needed
 - Product Development Manager – Oversee product manufacturing, distribution, responsible for quality and uniformity of products, maintaining inventory
 - Assistant Production Managers – Assist manager with product distribution; train packaging staff
 - Extraction Technicians – Operate extraction equipment and prepare samples
 - Product Assemblers – Assemble and weigh medicine; package, seal and label finished product; maintain appropriate stock level; clean and sanitize weigh stations
 - Inventory & Warehouse Manager – Maintain a clean and organized warehouse; oversee all shipping and receiving; supervise inventory and recordkeeping; oversee tracking and labeling of inventory
- 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

North Florida Group has teamed with an industry leader and plans to use cross training and Department of Health and State of Florida approved training to ensure all key staff are able to competently step in as needed either short term or long term into all key positions.

k. Plans and procedures for complying with OSHA regulations for workplace safety

All working environments comply with the United States Department of Labor Occupational Safety and Health Act (OSHA) requirements.

Additional workplace safety measures follow:

- Production areas will be a spark-free environment, with proper ventilation, and all standards will follow all applicable local fire, safety, and building codes in processing and the storage of the solvents.
- Employees using solvents to create marijuana extracts are fully trained on how to use the equipment, have direct access to applicable material safety data sheets, and handle and store the solvents safely. After completing all required training, the trainee must complete a “*Marijuana Concentrates Trainee Attestation*” and the trainer must complete the “*Marijuana Concentrates Instructor Attestation*.” Examples of these documents are included at the end of this manual.
- Ethyl Alcohol exhibits minimal potential human health-related toxicity. Solvents are of at least 99.5% purity and are used in a professional grade extraction system designed to recover the solvents.
- The final product shall follow state limits for PPM (parts per million) of residual solvent. Similarly, the final product shall not contain any contaminants as

outlined by local and state regulations. This shall be validated with a State Certified Laboratory.

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

NWCC has contracted services with Oglesby Nurseries which has one of the only state approved tissue culture laboratories.

4. Accountability

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.

Attachment 5 Green House

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. Diversion and trafficking prevention procedures

No sales or dispensing of medical marijuana product will be conducted at the manufacturing facility nor will the dispensary facilities produce or manufacture any form of medical marijuana. Medical marijuana products will be kept under locked conditions before/during/after production, during transportation, and distribution. Dispensaries will each have a vault for medical marijuana and for cash that are under strict access control.

The Security Plan incorporates physical security elements, electronic security systems, security staffing and detailed procedures to provide a secure environment for the safe and secure manufacturing of medical marijuana, transportation of product to dispensaries, and receipt, dispensing and sale of medical marijuana at the dispensaries. The Security Plan protects employees, patients and caregivers while simultaneously deterring and preventing entry into, and theft from, restricted access areas containing medical marijuana or cash. All security system equipment and recordings will be housed in secure locations as to prevent theft, loss, destruction, or alterations. NWCC will design and install the primary security system and install a redundant alarm system. The systems will be flexible and scalable for future growth or additional security.

d. A facility emergency management plan

Emergency Procedures

In case of a fire: There are two fire extinguishers available for small fires. In the event of a major fire, dial 911 immediately, trigger the fire alarm, and exit the building promptly. After contacting the fire department, contact the Product Development Manager and Director of Manufacturing.

In case of a chemical spill: Refer to any and all information and guidance provided on the Material Safety Data Sheet. In the event of a spill that poses any serious threat to health or safety, call 911 immediately. After contacting the fire department, contact the Product Development Manager and Director of Manufacturing.

In case of any other emergency: In the event of any emergency which poses any serious threat to health or safety, call 911 immediately. After contacting the fire department, contact the Product Development Manager and Director of Manufacturing.

In case of over-pressurization: If the extraction vessel becomes over-pressurized, the vessel will automatically relieve pressure through an automatic pressure release valve. If the automatic pressure release valve is triggered, operators present in the extraction room should leave the room immediately and wait at least 5 minutes to allow the room to ventilate. A detailed investigation should be conducted shortly thereafter in an effort to understand what caused the over pressurization.

See Attachment 5: Emergency Mgmt Plan

e. System for tracking low-THC source plant material throughout cultivation

Inventory Control

Inventory of all materials will be tightly controlled throughout the production process. The control processes include a comprehensive inventory system that ensures that all materials and products are accounted for, whether saleable or scrap.

A [redacted] Process will cover the complete inventory management experience, to track and reconcile inventories, investigate discrepancies and correct or prevent future actions.

[Redacted content]

f. Inventory control system for low-THC and Derivative Products

Traceability

Traceability is critical to every part of the process. The NWCC will use Radio-frequency identification (RFID) tags in order to track the product throughout the entire production process, from seed and clone through final distribution. The RFID tags will enable the NWCC to closely monitor every movement and step within the production process.

Internal tracking tags utilizing RFID technology will be generated for each plant material, and allow for the precise identification of any product. In instances where an issue of contamination may arise, or a recall is required, the RFID tracking system will allow for the pinpointing of the source for any problems.

g. Policies and procedures for recordkeeping

Meticulous records must be kept throughout the preparation, extraction, processing, and packaging of products.

The raw material weight, type of raw material, final product weight, product type, batch number, date, and time of processing must be recorded.

A "Concentrate Production Worksheet" is to be completed for each batch. After production is complete, these records are to be digitized and entered in METRC or other state selected Tracking Program as mandated by the MED. An example "Concentrate Production Worksheet" is available at the end of this training manual.

h. Vehicle tracking systems

Medical marijuana products will be transported between the manufacturing facility and dispensary facilities. Contents will be in a separate locked area, and not be visible from outside,

In order to prevent theft or diversion, all transported items will be recorded in a shipping manifest and packaged in large tamper resistant,

The product shipment room will be _____ and _____, allowing only authorized individuals to the room. All transportation will be delivered directly without any stops in between except for refueling or an emergency. The

armed transportation personnel will assess the surrounding area for potential threats, to confirm the area is secure and safe for product transaction.

i. Vehicle Security System

There will be random cash pick-ups from the dispensary to ensure that large amounts of cash do not remain on the premises. Cash will be picked up by [redacted] and transported directly to the company's financial institution. Cash will be brought to the [redacted] by [redacted] directly from the cash vaults on the premises. Any discrepancies will be immediately reported to the bank's Manager, and to the Dispensary's Business Manager, who will contact the Head of Dispensary Operations.

j. Methods of screening and monitoring employees

NWCC has joined together with Be Mindful, a recognized industry leader with unparalleled expertise and experience in marijuana growth and production. Yet, no matter how consummate an organization's experience may be in its manufacturing processes, it is, ultimately, powered by people, and it is that resource that truly distinguishes NWCC.

Careful planning has gone into the design of the NWCC staffing plan so that the goal of bringing an uninterrupted supply of uniformly consistent pharmaceutical-grade cannabis to patients suffering from certified debilitating and life-threatening diseases can be realized. The NWCC will utilize Be Mindful's extensive management and staffing experience to safely and responsibly comply with the State regulations governing the cultivation and production of medical cannabis (please see attached position descriptions).

General Staffing Practices

NWCC will demand strict ethical standards from its entire staff. Its policies and procedures require that all staff be 21 years of age or older and that employees have no convictions for felonies connected to the sale or possession of drugs, narcotics, or controlled substances. The Chief Legal Counsel will oversee rigorous backgrounds checks to ensure that all employees have no drug-related felony records. All key staff has already been identified and will be vetted to ensure both competence in their fields of expertise as well as their integrity and upstanding moral character. These will be individuals who are dedicated to community as demonstrated by the time they donate to serving others.

Moreover, in addition to putting together a team of highly capable, qualified and creative people to occupy the executive offices of its emerging company, the NWCC has assembled a group of people recognized for their expertise in such diverse areas as medicine and medical research, pharmacology, law, finance, and business to form an Advisory Group that will provide sage advice as NWCC goes from start-up to full implementation and beyond.

NWCC will adhere to strict protocols regarding sanitation and safety, security, and emergency procedures, the details of which are addressed in the organization's Operating Plan.

Its manufacturing center will have at least one senior member on staff with more than a year of experience in Good Agricultural Practices (GAPs). Its Quality Assurance Officer is both trained and experienced in quality assurance and quality control procedures as demonstrated in the attached resume.

Staff Training

The priorities of employee training at the approved marijuana facilities are:

- To ensure the safety and security of employees in potentially hazardous areas of marijuana processing as well as at the point of sale of a controlled substance;
- To prevent and detect diversion, theft or loss of marijuana and/or medical marijuana products; and
- To foster growth and career advancement for our employees.

Employees at the manufacturing facility will be trained in all facets of Good Agricultural Practices (GAP), including meticulous sanitation protocols for medical cannabis propagation, cultivation, harvesting, extracting, processing the brands and packaging the final product. They will learn about the necessity of keeping meticulous records throughout the preparation, extraction, processing, and packaging of products.

Employees using hazardous materials, such as pesticides and solvents, and potentially hazardous machinery to create marijuana extracts will be fully trained on how to use the equipment, will have direct access to applicable material safety data sheets, and be trained to handle and store all materials safely. They will learn exacting protocols for each process of cultivation and manufacturing, and will be expected to understand and follow them.

Employees at the dispensing facilities as well as drivers will learn about ways to protect the facility, the product and themselves by meticulously following all mandated security rules, such as, but not limited to, those related to the requirement of a Registry Identification Card for anyone on the premises who is not staff, keeping all entries locked at all times, and maintaining records which track inventory and sales as well as other recordkeeping procedures.

All employees will receive one week of training to be given by staff familiar with protocols, policies and procedures as they relate to the manufacturing and dispensing facilities. Employees will be trained in standard operating procedures; with hands-on audit-based training conducted on an on-going basis. They will be required to watch and learn from a training video series that will be accessible online. The video will be especially helpful to reinforce training and provide feedback on specific protocols. Staff will also receive ongoing additional training as needed.

Trainings will be conducted by experienced staff of the licensed Applicant including the CEO, Chief of Security, Cultivation Manager, Product Development Manager, and Compliance Officer. The Quality Assurance Officer will identify experts and vendor trainers to hold in-house trainings for all production employees, as well as key conferences and seminars for qualified employees.

k. Personnel qualifications and experience with chain of custody or other tracking mechanisms

Our Medical Director has worked closely with local and state law enforcement over the years in cases of rape, incest and other crimes against patients in his Obstetrical and gynecology practice. He has hands on experience in chain of custody procedures having testified as an expert witness multiple cases in which chain of custody was required to insure prosecution.

A major part in the chain of custody procedures is proper documentation and minimalizing/eliminating any chance of contamination. Nowhere is this more important than in criminal prosecution so to transition to cannabis production will be easily done.

In the case of Medical Marijuana this experience is invaluable to insure avoiding diversion of medications. Tracking and batch sampling is key. Tracking and sampling will allow quick removal of any defective product prior to distributing to the patient. This system is part of "Good Manufacturing Practices" as spelled out in the WHO's recent updated schedule. Our company has partnered with an independent laboratory approved

l. Personnel reserved solely for inventory control purposes

North Florida Compassionate Care will employ a Head of Inventory Management who will report to the Chief Financial Officer. S/he will be in charge of inventory across all systems and facilities at Be Mindful Medical, including raw materials, products, purchasing and orders.

Responsibilities will include:

- Day to day accountability for inventory across all systems and facilities
- Purchasing and ordering of all raw materials for all facilities
- Strong interface with Quality Assurance and Security to ensure that there is no theft or diversion of marijuana or medical marijuana products
- Regular audits and report to DOH, including access to the State-approved Seed to Sale system

m. Personnel reserved solely for security purposes

NWCC will employ an Information Technology & Cyber Security Office to establish and maintain all technology and security apparatus, including hardware and software to meet requirements to adopt and maintain security, tracking, recordkeeping, record retention and surveillance systems for: the cultivation, manufacturing, sale, delivery, transportation, distribution, or dispensing of approved medical marijuana products by the Applicant.

Responsibilities will include:

- Develop and implement specific measures for the protection of all electronic data throughout the company and its facilities; measures will prevent unauthorized access to data, prevent loss or theft of data and allow for the recovery of lost or stolen data;
- Design and implement measures and procedures to protect the privacy of certified patient, designated caregiver, employee and partner medical and personal information;
- After consultation with, and obtaining written approval from, the CEO, purchase all necessary and appropriate hardware (e.g. computers, back-up systems, back-up power sources and networking equipment), and services (e.g. Internet, secure Wi-Fi, anti-virus, firewall and cloud services), for the manufacturing facility and four dispensaries;
- Install hardware and provide a state of the art, secure networking system that offers industry standards of high security protection against loss, theft or diversion of product or corruption of information;
- Secure and encrypt systems as appropriate and supervise the use of access controls, including passwords, PINS, biometrics, encryption and two-factor authentication;
- Implement a business continuity and IT disaster recovery framework;
- Watch and learn from the webinar training, as well as any other training to be developed
- Develop detailed knowledge and understanding of the three main technical components of the Medical Marijuana Program (MMP): The Medical Marijuana Tracking and Management Solution; The Medical Marijuana Module in the existing NYS Clinical Laboratory Information Management System (CLIMS); The Seed to Sale Tracking Solution;
- Set up the technical components at each facility and enable all hardware and related software to work securely and seamlessly;
- Train staff in the use of the technical components and all security-related policies, protocols and procedures, including physical, data and network breach occurrence or incident protocols; provide ongoing training, as needed, both in groups and on an individual basis;
- Interface with the software developers and/or the NYS DOH through their help desk protocol to be developed, to troubleshoot problems or issues with the software; and
- Be available for off-hour emergency calls.

1. Waste disposal plan; and

NWCC waste disposal program will be fully compliant with the DOH rules and regulations. Cannabis Waste- Cannabis waste will be stored, secured, locked and managed in accordance with State regulations and as submitted and approved in the cultivation center's Operations and Management Practices Plan. All cannabis plant waste will be rendered unusable through incorporation with other ground materials so that the resulting mixture is at least 50% non-cannabis waste by volume.

Compostable Mixed Waste: Cannabis waste from the facility will be disposed of as compost, after having been mixed coco, the primary grow medium in a ratio of at least 50% coco to 50% cannabis material. All plant material will be ground through a chipper prior

to being mixed in the compost collection vessel.

Non-Compostable Mixed Waste: Auxiliary facility waste to be disposed of will be mixed with the following types of waste materials: 1) Paper waste; 2) Cardboard waste; 3) Plastic waste; 4) Soil; or 5) Other wastes approved by the Department (e.g., non-recyclable plastic, broken glass, leather). All recyclable waste will be recycled.

All cannabis waste and unusable product will be weighed, recorded and entered into the inventory system prior to mixing and disposal. Verification of this event will be performed by a supervisor and conducted in an area with video surveillance.

Employees with mandated and necessary certifications will receive any and all continuing education courses to ensure continued certification or licensure.

All employees will be hired on a probationary basis. After 90 days of initial employment, team members will be evaluated by their direct supervisor. If determined that a team member is a good fit, works collaboratively with fellow team members and demonstrates the ability to perform assigned tasks, they will be hired in a permanent capacity. At this time, they will be given a copy of Cannabis: Evolution and Ethno botany by Robert C. Clarke and Mark D. Merlin. This is recognized as the textbook for the cannabis industry. Significant training workshops modules on the origins, history, uses, breeding, taxonomy, and biology of this plant will be held in conjunction with assigned readings in this text.

n. Waste disposal plan

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o. Access to specialized resources or expertise regarding data collection, security, and tracking.

NWCC will utilize Be Mindful's proven process for data collection, security and tracking.



William D. Clark, Ph.D.

Former Director Research & Development, PharmaPrint, Inc.

Developer of Centrum™ Herbals

Former Vice President of Product Development & Regulatory Affairs, Mannatech, Inc.

For nearly 2 decades, Dr. William (Bill) Clark has been working with and developing natural products and nutraceuticals. A strong advocate of preventative care, Dr. Clark has directed research and development at the executive level, delivering monumental value to an entire industry. In fact, Dr. Clark has been instrumental to the establishment of nutraceuticals as a market force in the United States, Canada, Britain, Japan, New Zealand, & Australia. Dr. Clark's particular expertise spans the entire product continuum - from formula development to full commercial launch. Dr. Clark's efforts at PharmaPrint delivered six entirely new landmark products to the marketplace - the world renowned Centrum™ Herbals line. Dr. Clark was instrumental in the conception, formulation, and launch of Centrum™ Herbals (a Wyeth brand), resulting in over \$150 million of retail sales in its first year.

Some additional key industry achievements for Dr. Clark include helping NSF International complete initial development of their Dietary Supplement Certification Program. His contribution to the development of NSF's program was substantial. Dr. Clark also served on the Dietary Supplement Joint Committee that formed the new GMPs for the industry that have now been implemented into law by the FDA.

Dr. Clark's technical expertise includes not only research and development, product formulation, clinical studies, and product development, but also regulatory affairs and compliance, quality assurance and quality control, project management, and front line manufacturing and packaging of nutritional supplements.

Dr. Clark contributes an extraordinary magnitude of nutritional supplement experience, insight, business acumen, and industry relationships to the success of Pure Naturals Certified.

A few of his accomplishments include the following roles :

President & Co-Founder

Pure Naturals Certified

Dr. William Clark currently leads Pure Naturals Certified, a Contract Research Organization (CRO) that specializes in the research and development, product formulation & development, and clinical studies of nutraceuticals, natural products, and dietary supplements. Pure Naturals Certified is the only operating CRO with this targeted specialty.

President & Co-Founder

Pacific Nutritional Research, LLC

Dr. William Clark formerly led Pacific Nutritional Research, a Contract Research Organization (CRO) that performed clinical studies and provided marketing & technical services specifically for nutritional supplements to determine their benefits or other effects in the categories of weight management, general health and condition specific applications.

President & CEO

Ultimate Synergy, LLC

Dr. William Clark recently served as the CEO of Ultimate Synergy, a developer of high quality human and

equine nutritional supplements. He was the developer of the HALO™ Leaf of Life and Natrience™ product lines. Ultimate Synergy's HALO Leaf of Life™ is the most potent antioxidant drink on the market, based on a proprietary Fresh Olive Leaf Complex (FOLC).

Vice President, Product Development & Regulatory Affairs

Mannatech

While with Mannatech, Dr. Clark directed the global development for new and reformulated products. He served to improve product and process development in conjunction with contract manufacturers, R&D, QA, and Operations. Dr. Clark oversaw the complete manufacturing and project management processes, ensuring efficiency, consistency, and regulatory compliance with all Good Manufacturing Practice (GMP) Regulations during each cycle of product development. Further, Dr. Clark identified key manufacturing and raw material sources, and ensured regulatory review, compliance, and approval of all labeling, training, and marketing materials.

Director Research & Development

PharmaPrint

Dr. Clark supervised and directed ongoing QA/QC release, method development, and stability studies for all PharmaPrint products. Dr. Clark personally supervised and directed multiple laboratories in methods transfer, development, and validation of analytical test procedures for both Centrum Herbals and PharmaPrint Combination Products in accordance with pharmaceutical Current Good Manufacturing Practices (CGMPs). Dr. Clark was integral in the formulation, development, and manufacturing of PharmaPrint products and the institution of core enterprise standard operating procedures.

Education

Ph.D., Chemistry
University of California Santa Cruz, CA, 1997

M.S., Chemistry
University of California Santa Cruz, CA, 1995

B.A., Chemistry
University of California Santa Cruz, CA, 1992

Publications

"Investigations of Halogenated Constituents Isolated from Marine Sponges Associated with Cyanobacterial Symbionts" by W. D. Clark
Ph.D. Dissertation Thesis, June 1997.

"Cyclocinamide A, An Unusual Cytotoxic Halogenated Hexapeptide from the Marine Sponge Psammocinia",
by W. D. Clark, T. H. Corbett, F. A. Valeriote, and P. Crews
Journal of the American Chemical Society, **119** (39), 9285, 1997.

"A Novel Chlorinated Ketide Amino Acid, Herbamide A, from the Marine Sponge Dysidea herbacea", by W. D. Clark and P. Crews
Tetrahedron Letters, **36**, 1185, 1995.

Marijuana Extraction and Processing Standard Operating Procedure

Standard Operating Procedure Overview

Proprietary Information

17 pages - Trade Secrets

Standby Generators

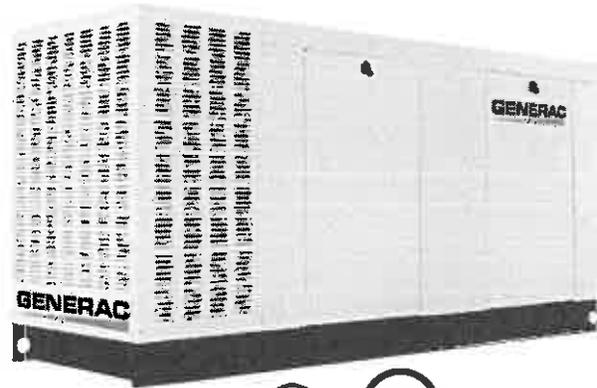
Standby Generators Liquid-Cooled Gas Engine

INCLUDES:

- Two Line LCD Tri-Lingual Digital Nexus™ Controller
- Isochronous Electronic Governor
- Sound Attenuated Enclosure
- Closed Coolant Recovery System
- Smart Battery Charger
- UV/Ozone Resistant Hoses
- ±1% Voltage Regulation
- Natural Gas or LP Operation
- 2 Year Limited Warranty
- UL 2200 Listed

Standby Power Rating

- Model QT070 (Aluminum - Bisque) - 70 kW 60 Hz
- Model QT080 (Aluminum - Bisque) - 80 kW 60 Hz
- Model QT100 (Aluminum - Bisque) - 100 kW 60 Hz
- Model QT130 (Aluminum - Bisque) - 130 kW 60 Hz
- Model QT150 (Aluminum - Bisque) - 150 kW 60 Hz



QUIET-TEST™

Meets EPA Emission Regulations

70, 100, 130 & 150 kW meet CA/MA emissions requirement with optional catalyst
80 kW not for sale in CA/MA

FEATURES

- **INNOVATIVE DESIGN & PROTOTYPE TESTING** are key components of GENERAC'S success in "IMPROVING POWER BY DESIGN." But it doesn't stop there. Total commitment to component testing, reliability testing, environmental testing, destruction and life testing, plus testing to applicable CSA, NEMA, EGSA, and other standards, allows you to choose GENERAC POWER SYSTEMS with the confidence that these systems will provide superior performance.
 - **SOLID-STATE, FREQUENCY COMPENSATED VOLTAGE REGULATION.** This state-of-the-art power maximizing regulation system is standard on all Generac models. It provides optimized FAST RESPONSE to changing load conditions and MAXIMUM MOTOR STARTING CAPABILITY by electronically torque-matching the surge loads to the engine. Digital voltage regulation at ±1%.
 - **SINGLE SOURCE SERVICE RESPONSE** from Generac's extensive dealer network provides parts and service know-how for the entire unit, from the engine to the smallest electronic component.
 - **GENERAC TRANSFER SWITCHES.** Long life and reliability are synonymous with GENERAC POWER SYSTEMS. One reason for this confidence is that the GENERAC product line includes its own transfer systems and controls for total system compatibility.
- **TEST CRITERIA:**
- ✓ **PROTOTYPE TESTED**
 - ✓ **SYSTEM TORSIONAL TESTED**
 - ✓ **NEMA MG1-22 EVALUATION**
 - ✓ **MOTOR STARTING ABILITY**

GENERAC®



70 • 80 • 100 • 130 • 150 kW**application & engineering data****GENERATOR SPECIFICATIONS**

Type	Synchronous
Rotor Insulation Class	H
Stator Insulation Class	H
Telephone Interference Factor (TIF)	<50
Alternator Output Leads 1-Phase	4 wire
Alternator Output Leads 3-Phase	6 wire (70, 80 & 150 kW) or 12 wire (100 & 130 kW)
Bearings	Sealed Ball
Coupling	Flexible Disc (70, 80 & 150 kW) or Gear Drive (100 & 130 kW)
Excitation System	Brushless

VOLTAGE REGULATION

Type	Electronic
Sensing	Single Phase
Regulation	± 1%

GOVERNOR SPECIFICATIONS

Type	Electronic
Frequency Regulation	Isochronous
Steady State Regulation	± 0.25%

ELECTRICAL SYSTEM

Battery Charge Alternator	12 Volt 30 Amp
Static Battery Charger	2 Amp
Recommended Battery	Group 24F, 525 CCA (70, 80 & 150 kW) or Group 27F, 700 CCA (100 & 130 kW)
System Voltage	12 Volts

GENERATOR FEATURES

Revolving field heavy duty generator Directly connected to the engine Operating temperature rise 120 °C above a 40 °C ambient Class H insulation is rated at 150 °C rise at 25 °C ambient All models fully prototyped tested
--

ENCLOSURE FEATURES

Aluminum weather protective enclosure	Ensures protection against mother nature. Electrostatically applied textured epoxy paint for added durability.
Enclosed critical grade muffler	Quiet, critical grade muffler is mounted inside the unit to prevent injuries.
Small, compact, attractive	Makes for an easy, eye appealing installation.
SAE	Sound attenuated enclosure ensures quiet operation.

ENGINE SPECIFICATIONS: 60 kW

Make	Generac
Model	V-Type
Cylinders	8
Displacement (Liters)	5.4
Bore (in/mm)	3.55/90.2
Stroke (in/mm)	4.17/105.9
Compression Ratio	9:1
Intake Air System	Naturally Aspirated
Lifter Type	Hydraulic

ENGINE SPECIFICATIONS: 70, 100, 130 & 150 kW

Make	Generac
Model	V-Type
Cylinders	10
Displacement (Liters)	6.8
Bore (in/mm)	3.55/90.2
Stroke (in/mm)	4.17/105.9
Compression Ratio	9:1
Intake Air System	Naturally Aspirated
Lifter Type	Hydraulic

ENGINE LUBRICATION SYSTEM

Oil Pump Type	Gear
Oil Filter Type	Full flow spin-on cartridge
Crankcase Capacity (qt/l)	5/4.7 (70, 100, 130 & 150 kW) or 6/5.7 (80 kW)

ENGINE COOLING SYSTEM

Type	Closed
Water Pump	Belt driven
Fan Speed (rpm)	2300 - 70 kW 2174 - 80 kW 1670 - 100 kW 1950 - 130 kW 2200 - 150 kW
Fan Diameter (in/mm)	22/558.8 (70 kW) or 26/660.4 (80, 100, 130 & 150 kW)
Fan Mode	Pusher (70 kW) or Puller (80, 100, 130 & 150 kW)

FUEL SYSTEM

Fuel Type	Natural gas, propane vapor
Carburetor	Down Draft
Secondary Fuel Regulator	Standard
Fuel Shut Off Solenoid	Standard
Operating Fuel Pressure	11-14" water column/21-26 mm HG

(All ratings in accordance with BS5514, ISO3046, ISO8528, SAE J1349 and DIN6271)

70 • 80 • 100 • 130 • 150 kW

operating data

GENERATOR OUTPUT VOLTAGE/KW - 60 Hz

		kW LPG	Amp LPG	kW Nat. Gas	Amp Nat. Gas	CB Size (Both)
QT070	120/240 V, 1Ø, 1.0 pf	67	292	64	267	300
	120/208 V, 3Ø, 0.8 pf	70	243	67	232	300
	120/240 V, 3Ø, 0.8 pf	70	211	67	201	250
	277/480 V, 3Ø, 0.8 pf	70	105	67	101	125
QT080	120/240 V, 1Ø, 1.0 pf	77	333	77	333	400
	120/208 V, 3Ø, 0.8 pf	80	278	80	278	300
	120/240 V, 3Ø, 0.8 pf	80	241	80	240	300
QT100	277/480 V, 3Ø, 0.8 pf	80	120	80	120	150
	120/240 V, 1Ø, 1.0 pf	100	417	89	371	500
	120/208 V, 3Ø, 0.8 pf	100	347	94	326	400
	120/240 V, 3Ø, 0.8 pf	100	301	94	283	350
QT130	277/480 V, 3Ø, 0.8 pf	100	150	94	141	175
	120/240 V, 1Ø, 1.0 pf	130	542	117	488	600
	120/208 V, 3Ø, 0.8 pf	130	451	122	423	500
	120/240 V, 3Ø, 0.8 pf	130	391	122	367	450
QT150	277/480 V, 3Ø, 0.8 pf	130	195	122	183	225
	120/240 V, 1Ø, 1.0 pf	144	625	136	567	700
	120/208 V, 3Ø, 0.8 pf	150	520	142	493	600
	120/240 V, 3Ø, 0.8 pf	150	451	142	427	500
	277/480 V, 3Ø, 0.8 pf	150	225	142	214	250

SURGE CAPACITY IN AMPS

		Voltage Dip @ < .4 pf	
		15%	30%
QT070	120/240 V, 1Ø	129	356
	120/208 V, 3Ø	194	471
	120/240 V, 3Ø	168	408
	277/480 V, 3Ø	83	201
QT080	120/240 V, 1Ø	174	435
	120/208 V, 3Ø	186	466
	120/240 V, 3Ø	161	404
QT100	277/480 V, 3Ø	70	175
	120/240 V, 1Ø	150	413
	120/208 V, 3Ø	186	452
	120/240 V, 3Ø	161	392
QT130	277/480 V, 3Ø	107	261
	120/240 V, 1Ø	236	648
	120/208 V, 3Ø	364	885
	120/240 V, 3Ø	315	767
QT150	277/480 V, 3Ø	161	390
	120/240 V, 1Ø	486	1214
	120/208 V, 3Ø	534	1334
	120/240 V, 3Ø	463	1156
	277/480 V, 3Ø	250	624

ENGINE FUEL CONSUMPTION

		Natural Gas		Propane	
		(ft³/hr)	(m³/hr)	(gal/hr)	(l/hr)
QT070	Exercise cycle	110	3.1	1.2	4.6
	25% of rated load	260	7.4	2.85	10.8
	50% of rated load	500	14.2	5.46	20.8
	75% of rated load	696	19.8	7.62	29.1
	100% of rated load	1020	29	11.17	42.6
QT080	Exercise cycle	95	2.7	1	3.9
	25% of rated load	549.5	15.6	6.99	1.85
	50% of rated load	784.4	22.2	10.16	2.68
	75% of rated load	1024.8	29.0	13.11	3.46
QT100	100% of rated load	1252.2	35.5	15.71	4.15
	Exercise cycle	130	3.7	1.4	5.4
	25% of rated load	371	10.5	4.1	15.5
	50% of rated load	713	20.3	7.9	29.8
QT130	75% of rated load	991	28.2	11	41.5
	100% of rated load	1260	35.8	13.9	52.6
	Exercise cycle	135	3.8	1.4	5.7
	25% of rated load	482	13.7	5.3	20
QT150	50% of rated load	927	26.3	10.3	38.7
	75% of rated load	1292	36.7	14.3	54
	100% of rated load	1786	50.8	19.8	74.6
	Exercise cycle	155	4.4	1.7	6.5
QT150	25% of rated load	556	15.8	6.09	23.2
	50% of rated load	1070	30.4	11.72	44.7
	75% of rated load	1491	42.4	16.33	62.3
	100% of rated load	2061	58.6	22.57	86.1

Note: Fuel pipe must be sized for full load.

For Btu content, multiply gal/hr x 90950 (LP) or ft³/hr x 1000 (NG).

For megajoule content, multiply l/hr x 25.35 (LP) or m³/hr x 37.26 (NG).

Refer to "Emissions Data Sheets" for maximum fuel flow for EPA and SCAQMD permitting purposes.

STANDBY RATING: Standby ratings apply to installations served by a reliable utility source. The standby rating is applicable to varying loads for the duration of a power outage. There is no overload capability for this rating. Ratings are in accordance with ISO-3046-1. Design and specifications are subject to change without notice.

70 • 80 • 100 • 130 • 150 kW**operating data****ENGINE COOLING**

	70 kW	80 kW	100 kW	130 kW	150 kW
Air flow (inlet air including alternator and combustion air in ft ³ /min)	5200/147.2	5300/150.1	5500/155.7	6450/182.6	7800/220.9
System coolant capacity (gal/liters)	4.5/17	4/15.1	4.5/17	4.5/17	4.5/17
Heat rejection to coolant (BTU/hr)	287,000/302.8	316,000/333.4	342,000/360.8	496,000/523.3	568,000/599.3
Maximum operation air temperature on radiator (°C/°F)	60/150				
Maximum ambient temperature (°C/°F)	50/140				

COMBUSTION REQUIREMENTS

	70 kW	80 kW	100 kW	130 kW	150 kW
Flow at rated power (cfm/cmm)	205/5.8	143/4	262/7.4	336/9.5	410/11.6

SOUND EMISSIONS

	70 kW	80 kW	100 kW	130 kW	150 kW
Sound output in dB(A) at 23 ft (7 m) with generator in exercise mode*	67	64	61	65	66
Sound output in dB(A) at 23 ft (7 m) with generator operating at normal load*	72	74	72	75	79

*Sound levels are taken from the front of the generator. Sound levels taken from other sides of the generator may be higher depending on installation parameters.

EXHAUST

	70 kW	80 kW	100 kW	130 kW	150 kW
Exhaust flow at rated output (cfm/cmm)	557/15.8	720/20.4	888/25.1	1119/31.7	1535/43.5
Exhaust temperature at muffler outlet (°C/°F)	477/890	796/1465	516/960	521/970	593/1100

ENGINE PARAMETERS

	70 kW	80 kW	100 kW	130 kW	150 kW
Rated Synchronous rpm	1800	3600	2300	2970	3600

POWER ADJUSTMENT FOR AMBIENT CONDITIONS

Temperature Deration	3% for every 10 °C above 25 °C or 1.65% for every 10 °F above 77 °F
Altitude Deration (70,100,130 & 150)	1% for every 100 m above 183 m or 3% for every 1000 ft above 600 ft
Altitude Deration (80 kW)	1% for every 100 m above 915 m or 3% for every 1000 ft above 3000 ft

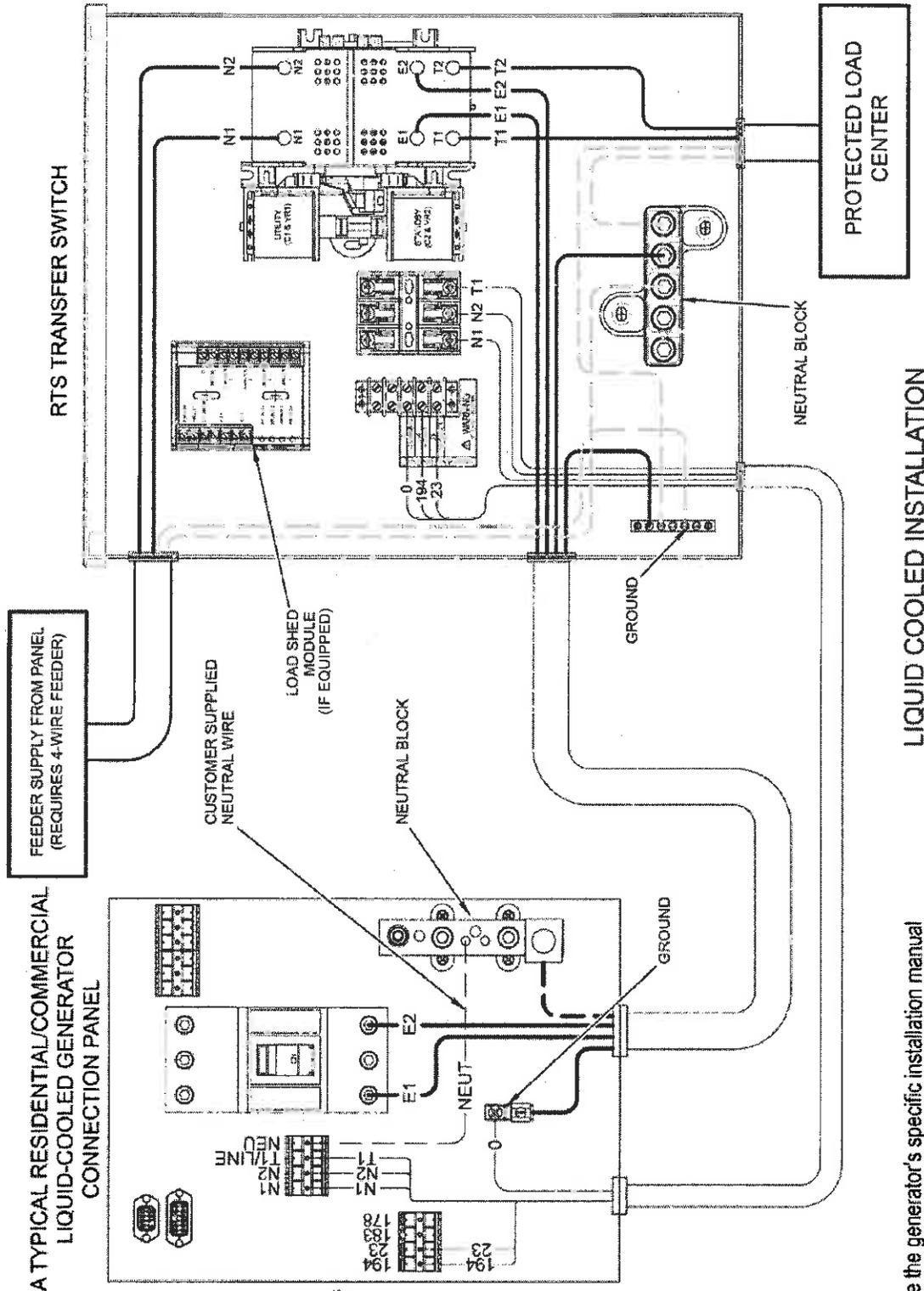
CONTROLLER FEATURES

2-Line Plain Text LCD Display	Simple user interface for ease of operation.
Mode Switch: Auto	Automatic Start on Utility failure. 7 day exerciser
Off	Stops unit. Power is removed. Control and charger still operate.
Manual	Start with starter control, unit stays on. If utility fails, transfer to load takes place.
Programmable start delay between 10-30 seconds	Standard
Engine Start Sequence	Cyclic cranking: 16 sec on, 7 rest (90 sec maximum duration)
Engine Warm-up	5 sec
Engine Cool-Down	1 min
Starter Lock-out	Starter cannot re-engage until 5 sec after engine has stopped.
Smart Battery Charger	Standard
Automatic Voltage Regulation with Over and Under Voltage Protection	Standard
Automatic Low Oil Pressure Shutdown	Standard
Overspeed Shutdown	Standard, 72 Hz
High Temperature Shutdown	Standard
Overcrank Protection	Standard
Safety Fused	Standard
Failure to Transfer Protection	Standard
Low Battery Protection	Standard
50 Event Run Log	Standard
Future Set Capable Exerciser	Standard
Incorrect Wiring Protection	Standard
Internal Fault Protection	Standard
Common External Fault Capability	Standard
Governor Failure Protection	Standard

Model #	Product	Description
006463-3	Mobile Link™	Generac's Mobile Link allows you to check the status of your generator from anywhere that you have access to an Internet connection from a PC or with any smart device. You will even be notified when a change in the generator's status occurs via e-mail or text message. Note: Harness Adapter Kit required.
006478-0	Harness Adapter Kit	The Harness Adapter Kit is required to make liquid-cooled units compatible with Mobile Link™.
005632-1 - 70, 80 & 150 kW 005633-0 - 100 & 130 kW	Cold Weather Kit	If the temperature regularly falls below 32 °F (0 °C), install a cold weather kit to maintain optimal battery temperature. Kit consists of battery warmer with thermostat built into the wrap.
005620-0 - 70, 100 & 130 kW 006204-0 - 80 kW 005667-0 - 150 kW	Extreme Cold Weather Kit	Recommended where the temperature regularly falls below 32 °F (0 °C) for extended periods of time. For liquid cooled units only.
005651-0	Base Plug Kit	Add base plugs to the base of the generator to keep out debris.
005703-0	Paint Kit	If the generator enclosure is scratched or damaged, it is important to touch-up the paint to protect from future corrosion. The paint kit includes the necessary paint to properly maintain or touch-up a generator enclosure.
005660-0 - 70, 100, 130 & 150 kW 006915-0 - 80 kW	Scheduled Maintenance Kit	The Liquid-Cooled Scheduled Maintenance Kits offer all the hardware necessary to perform complete maintenance on Generac liquid-cooled generators.
006664-0	Wireless Remote	Completely wireless and battery powered, Generac's wireless remote monitor provides you with instant status information without ever leaving the house.
006873-0	Smart Management Module (50 Amps)	Smart Management Modules are used in conjunction with the Automatic Transfer Switch to increase its power management capabilities. It provides additional power management flexibility not found in any other power management system.

70 • 80 • 100 • 130 • 150 kW

Drawing #0H7452-D



LIQUID COOLED INSTALLATION

Note: Use the generator's specific installation manual and wiring diagrams to verify generator wiring connections, as they may differ slightly from illustration.

80 kW

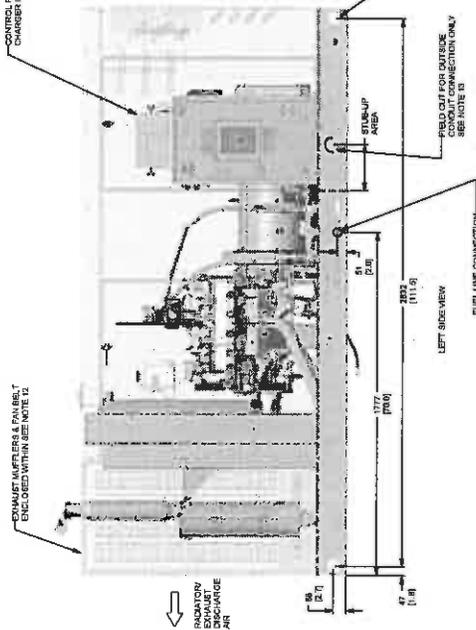
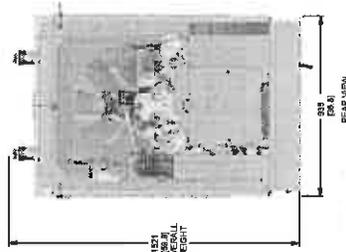
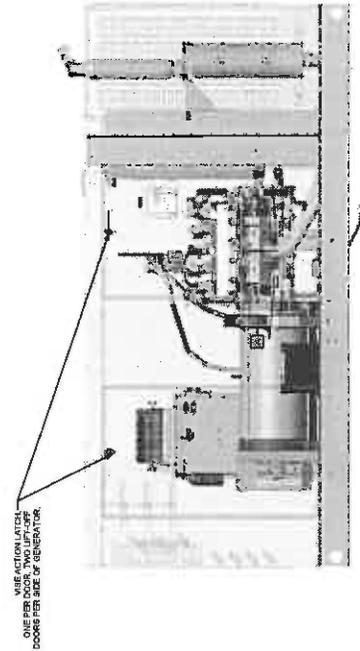
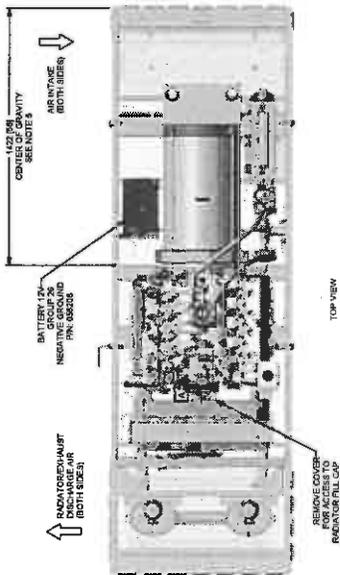
Drawing #OL3178-A

installation layout

- NOTES:**
1. MINIMUM RECOMMENDED CONCRETE PAD SIZE: (241 (97") WIDE X 228 (127") LONG. CONCRETE PAD MUST BE REINFORCED WITH #4 REBAR. REBAR MUST BE INSTALLED IN ACCORDANCE WITH CURRENT AND SERVICES. THIS MUST BE INSTALLED IN ACCORDANCE WITH CURRENT AND SERVICES. THIS MUST BE INSTALLED IN ACCORDANCE WITH CURRENT AND SERVICES.
 2. ALLOW SUFFICIENT ROOM ON ALL SIDES OF THE GENERATOR FOR MAINTENANCE LINES AND SERVICE. THIS MUST BE INSTALLED IN ACCORDANCE WITH CURRENT AND SERVICES.
 3. CONDUCT WORK IN ACCORDANCE WITH ALL APPLICABLE ELECTRICAL, MECHANICAL, AND LOCAL CODES.
 4. CONDUCT WORK IN ACCORDANCE WITH ALL APPLICABLE ELECTRICAL, MECHANICAL, AND LOCAL CODES.
 5. ACCESSIBLE THROUGH CUSTOMER ACCESS ASSEMBLY DOOR ON REAR OF GENERATOR. BATTERY CHARGER IS 20 VOLT AC (LAMP MAX) CONNECTION AND ACCESS TO TRANSFER SWITCH IS THROUGH TRANSFER SWITCH DOOR ON REAR OF GENERATOR.
 6. BOTTOM OF GENERATOR SET MUST BE ENCLOSED TO PREVENT PEST INTRUSION AND EXHAUST SYSTEM MUST HAVE MAXIMUM BACK PRESSURE 2 INCHES H₂O.
 7. EXHAUST SYSTEM MUST HAVE MAXIMUM BACK PRESSURE 2 INCHES H₂O.
 8. RESIDUAL OWNER MANUAL FOR LIFTING WARNINGS.
 9. EXHAUST SYSTEM MUST HAVE MAXIMUM BACK PRESSURE 2 INCHES H₂O.
 10. EXHAUST SYSTEM MUST HAVE MAXIMUM BACK PRESSURE 2 INCHES H₂O.
 11. GENERATOR MUST BE INSTALLED SUCH THAT FRESH COOLING AIR IS AVAILABLE.
 12. REMOVE EITHER LEFT OR RIGHT HAND SIDE PANEL TO ACCESS EXHAUST MUFFLERS.
 13. FIELD CUT-HOLE IS ONLY REQUIRED FOR MOUNTING OF GENERATOR ON AN EXISTING PAD.

SERVICE ITEM	QTY
OIL FILL CAP	1
LEFT DOOR	1
RIGHT DOOR	1
OIL FILTER	1
LEFT DOOR	1
RIGHT DOOR	1
RADIATOR DRAIN HOSE	1
LEFT DOOR	1
RIGHT DOOR	1
AIR CLEANER ELEMENT	1
LEFT DOOR	1
RIGHT DOOR	1
FAN BELT	1
LEFT DOOR	1
RIGHT DOOR	1
BATTERY	1

REFERENCE OWNERS MANUAL FOR PERIODIC REPLACEMENT PART LISTINGS



WEIGHT DATA

ENCLOSURE MATERIAL	WEIGHT ONLY (KG LBS)	SHIPPING PAD (KG LBS)	NET WEIGHT (KG LBS)
3-COLOR	231 (509)	79 (173)	152 (336)

DIMENSIONS: MM [INCH]

PART III-Continued

Northwest Compassionate Care, Inc

Application for Low-THC Cannabis Dispensing Organization

C. Dispensing

Northwest Compassionate Care, LLC is ready, able and committed to comply with all mandated state, city and local laws and regulations relating to the dispensing and sale of medical marijuana product at its proposed dispensing facilities. Each of the dispensary facilities will adhere to all rules and regulations of Florida's Medical Marijuana Program, as well as future Florida State rules and regulations and procedures to be established by the Florida Department of Health Commissioner. Additionally, each dispensary will comply with all rules and regulations of the city and local governments applicable to the specific communities in which each of the four dispensaries is located.

1. Technical Ability

a. Experience interacting with patients;

North Florida Group Medical Director and Deputy Medical Directors have extensive experiences within their respective practices interacting with patients.

Stephen W Duncan, MD - Medical Director

20 years

George J Arcos, DO – Deputy Medical Director

32 years

Kirk J Mauro, MD – Deputy Medical Director

24 years

b. Experience with handling confidential information;

NWCC's owners and staff team have countless years in their respective fields handling sensitive and confidential information. As medical doctors, the medical director and deputy directors strictly follow all HIPPA laws and regulations.

e. A marketing plan;

The basis of our plan is to educate Florida physicians, first and foremost, as they will be the initiating factor for any patient to receive Medical Marijuana. We propose this initial action by means of advertising in every medical and community publication. Also by reaching physicians via mail outs and emails announcing educational seminars held at various locations and times in accordance to physician's availability.

In conjunction with this approach we plan to set-up in office presentations for a one on one with physicians who see and treat the type of patients who will benefit from this medication. By using this approach we will insure that physicians feel comfortable with their knowledge of cannabis based medications and will be more likely to offer their patients these new and innovative options.

Due to cannabis being a federal schedule one drug television and radio advertising for the product directly to patients is unlawful. We will however advertise to the public and physicians about free informative seminars, where there will be a presentation followed by question and answer session. We will also formulate informative handouts and literature for both physicians and the general public which will answer basic questions and direct them to our website which will offer much more depth and detail.

This approach will require the employment of multiple personal and large resources which have been ear marked in our budget. We feel informing the public about the positive impact of medical marijuana in so many lives and dispelling myths about its perceived negative impact is of utmost importance. The better informed patients are, the more we can help them.

d. Experience gathering and managing data, i.e. data on patient reactions to products dispensed;

Dispensary Quality Assurance Plan (DQAP): The DQA Plan will regulate and monitor the Applicant's medical marijuana dispensing practices to benefit the health, welfare and pain management of each patient within the controlled setting. The DQA Plan will ensure that medical marijuana products are accurately dispensed to the proper certified patient and designated caregiver listed on each prescription. It will identify and prevent mistakes in inventory management and, dispensing. As a robust quality assurance program, DQAP will track incidents of inventory discrepancies, patient complaints, product returns and adverse events; document the investigation on the reason for each incident; and record the appropriate corrective action(s) taken to rectify any errors or events. Daily and monthly record reconciliations will highlight any discrepancies and allow dispensary administrators to detect, identify and correct dispensing errors. Competent and trustworthy dispensary personnel will adhere to the company's recordkeeping and quality assurance protocols. The Quality Assurance Officer, Head of Dispensary Operations, and each on-site Pharmacist and Business Manager will closely supervise this effective multi-faceted quality assurance system at each dispensary to detect, deter and prevent dispensary errors.

e. Experience with recalls;

Policy for Returns, Complaints, Adverse Events and Recalls

Rigorous procedures are in place to investigate and document all returns, complaints, and adverse events, as well as recall, re-test, store and ultimately dispose of any manufactured medical marijuana products that are deemed suspect or not compliant with mandated regulations. Every complaint and return will be documented and addressed immediately. Each will be brought to the attention of the Quality Assurance Officer who will be solely responsible for investigation and resolution of the issues across all systems. S/he will maintain close communication with the Department, notifying them within 24 hours of any returns, complaints, adverse events and/or recalls.

Policy for Recalls

The Applicant will conduct a recall of a product or products in the event of: 1) A mandatory recall requested by the Department; 2) A substantiated and confirmed complaint by a customer which is verified as suspect or hazardous through testing ; 3) A voluntary recall due to defective packaging or labeling, or a product that has been identified to have a health or safety concern not specified by the Department, or 4) A failed laboratory testing that may pose a health safety concern due to microbial or other adulterations, i.e. *Microbes, Mycotoxins, Solvent Residues*.

Procedures for Return, Complaint, Adverse Event or Recalls

In order to ensure 24/7 consumer safety and trust, a toll free recall number will be clearly printed on the label of each approved medical marijuana product. Provision will be made for emergency paging of an officer in charge should there be a true emergency. Patients may also come to their individual dispensary with a return. When a patient relates a complaint or return, the reason for the action will be recorded along with the name of the patient, the date and the staff person to whom it was related. The Quality Assurance Officer will be notified immediately. S/he will debrief the patient and/or caregiver, and then consult with the certified physician and dispensing Pharmacist to determine whether the complication was due to a non-product related cause, e.g., incorrect dosage, improper administration. If a different cause is identified, it will be recorded in the complaint file. If no external cause was found, the product will be tested.

Product Re-Testing

A sample of the product will be expedited to an independent laboratory and tagged with a unique identifier for clear reference. A sample of the product will be retained for examination by the Department. If, upon retesting, the product is found to be consistent and in compliance with all State regulations and Northwest Compassionate Care specifications, the result will be noted in the records and the patient will be counseled by the dispensing Pharmacist with support of the Quality Assurance Officer, if necessary. If the product is found to be faulty, whether due to contamination, inconsistent cannaboid profile or other problem, the Department will be notified, and recall and hold procedures will be enacted immediately. Such products will be returned to

the manufacturing facility and will be disposed of in a way that renders them unusable, as per below.

Recall Parameters and Procedures

Product Identification

In the event of a recall, the following information will be obtained by Site Management: product identity (lot, code date, serial number); description of defect; date; circumstances under which defect was found; evaluation of risk; production quantity; and estimated quantities of distribution. The most effective and efficient recall strategy will be determined and executed. Assessment of production quantities and amount and destinations of product shipped will be made and an immediate recall will be carried out.

All products in processor control will be placed in quarantine and proper hold procedures will be followed. Any existing material within the manufacturing facility or dispensaries will be placed on hold. If feasible, transports with recalled material will be canceled. Otherwise, the recalled products will be flagged and the receiving dispensaries will be notified that the incoming product is to be immediately quarantined.

Recall Protocols

- NOTIFICATION - The Quality Assurance Officer will notify the Department about complaints, adverse events and recalls within 24 hours.
- CONDUCT TRACEABILITY PROCEDURES - Records will be consulted to check for and reconcile any deviations or discrepancies that have occurred. All product and materials affected by this deviation may be considered potentially hazardous and will be quarantined and disposed of as mandated.
- RECALL WINDOW - The Quality Assurance Officer will determine if the incident is isolated to a specific lot or if there is potential for distribution among other lots, products and/or ingredients. In the event that the recall is a result of contamination, s/he will attempt to pinpoint the manufacturing juncture at which the product was adversely affected.
- DEPTH OF RECALL – Thorough tracing will determine how deep the recall is within the supply chain and the extent to which the recalled product was disseminated (warehouse, dispensaries, patients/ caregivers). This will be accomplished through the Product Traceability Worksheet (see below).
- EFFECTIVENESS CHECK - Site Management will initiate specific checks with each dispensary to confirm that proper removal of the product is carried out. This will include the reconciliation of the total amount of the recalled product received by the dispensary, the quantity sold to individual recipients, and the remainder in storage. The identity of the recipients will also be documented. All dispensaries, staff, patients and caregivers who received the faulty product will be notified immediately via phone and e-mail. A recall notification also will be posted on the Applicant's website. Recipients will be asked to confirm in writing that they were notified of the recall.
- REPLENISHMENT AND REIMBURSEMENT - Site Management and the

Quality Assurance Officer will identify specific lots that may be available for replacement. Customers will be reimbursed for any material that cannot be replaced.

- **PRODUCT DISPOSAL** - Disposal methods will ensure that all recalled material are destroyed in a manner that renders it completely unusable and prevents further circulation.

Quarantine Procedure

Northwest Compassionate Care will place recalled items in quarantine as mandated by the Department. A "QUARANTINE" tag will be applied to the pallet or container of the product. The "QUARANTINE" tag will include the: brand, lot number, amount of product held, reason for holding, final product disposition and the contact responsible for final disposition and date. The quarantined products will not be transported, distributed or dispensed without express approval from the Department. Product Holds that may pose a safety or cross-contamination threat will be segregated from other product in the storage bay and placed in the quarantine area. All products that are placed on hold will be reported to identify corrective actions, preventative measures and root cause.

Disposal Procedure

The Applicant will grind and shred all recalled or contaminated product plus waste plant material with grow medium (recycled coconut husk), rendering them unusable and unrecognizable. If not contaminated, the ground waste material will be composted and eventually used as a soil additive. If contaminated, the waste material will be disposed of in ways recommended by the Department.

f. Knowledge of cannabis routes of administration;

Smoking cannabis produces the most immediate relief and permits the most refined control of your dosage. When cannabis is smoked, the active ingredients are deposited directly into the blood stream after being absorbed through the mucus membrane of the lung. Determining correct dosage is easier with smoked cannabis since the effects are usually felt within 30-

60 seconds and develop fully within 5-15 minutes. The effects may last from 30 minutes to 3 hours. Cannabis dosage is fairly easy to manage. Take 1-2 puffs and wait 5-15 minutes in order to assess the right dosage. Take more puffs as needed. With reasonably high potency cannabis buds a small number of puffs (1-3) are generally enough. While smoking any material is not good for the lungs, the amount of cannabis you need to smoke is so small you should not be overly concerned. There are various methods of smoking cannabis that can reduce bronchial irritation while obtaining the medicinal benefits of the plant. These methods include:

Hand Rolling For those that can tolerate smoking hand rolled cannabis cigarettes or joints are the most common and widely used method. Cannabis may be ground or cut and then rolled into a

joint. Using natural-based chemical free rolling papers such as those derived from hemp or rice is recommended for health reasons and to avoid using tree products. Pipes

Pipes can be used to avoid smoking paper and are useful when smoking small quantities.

We recommend glass pipes to prevent ingestion of possible harmful by-products from pipes made from other sources of material. Glass pipes have been found to provide a very clean burn and impart no chemicals. Water pipes Water pipes can be used to cool the temperature of the inhaled smoke. Contrary to popular belief, studies have shown that the inhaled THC content may actually be decreased by this method.

Vaporizing

Vaporizers can be used as a smokeless alternative. Cannabis vaporizers are designed to let users inhale active cannabinoids while avoiding smoke. Vaporizers work by heating the cannabis just below the point of combustion, the point at which smoke is produced. When the cannabis is properly heated, THC and other cannabinoids are emitted in the form of a vapor. This markedly reduces the amount of irritating particulate materials that get inhaled, resulting in much less inflammation and damage to the lining of the lungs. Many patients who find smoked cannabis highly irritating report effective relief inhaling through vaporizers. Vaporizing is believed to mitigate many if not all of the negative effects of smoking. Dose is through self titration (gradually adjusting the dose of medicine until the desired effect is achieved). The procedure for vaporizing is similar to smoking. It is advised to wait a few minutes to feel the full effect before taking more.

Eating

Cannabinoids can be extracted into fat (butter or oils) and then ingested, usually in the form of baked goods or in candy-like products. When cannabis is digested, the active ingredients are metabolized in the liver before entering the blood stream. The effects of ingested cannabis may be felt within 30 minutes to 2 hours depending on metabolism and may last from 2-8 hours with the side effects being stronger than those felt by smoking. Therefore, it is more challenging to regulate the dosage. You cannot overdose on cannabis, however side effects can be intense and overwhelming. Use caution when trying edible products especially if you did not make them. Try small doses at first and give yourself a few days to figure out the correct titration.

Tea

Like other herbs, cannabis can be made into a tea. Boil the water first and pour it over the cannabis. Allowing the cannabis to steep for approximately an hour and a half will ensure extraction of the cannabinoids. The effects are similar to eating it.

Tincture

A tincture is a process of using alcohol to extract cannabinoids from the plant into a liquid form.

Tincture preparations have a similar effect as eating cannabis but the onset happens more rapidly and wears off more quickly. Tinctures may be dropped or sprayed into the mouth to be absorbed into the mucous membranes. Effects of tinctures are usually felt within 5 minutes up to 1 hour

and last about 4 hours. It is recommended to start with about 3 drops of tincture, and wait an hour before increasing the dosage incrementally and as necessary. Alcohol based tinctures may also be dropped into hot water in order to let the alcohol evaporate and then ingested. Effects will be the same as they are for ingested cannabis.

Topical treatments

Cannabis can be absorbed through the skin and so it is ideal for topical ointments.

Marinol Marinol is a synthetic petrochemical analog of THC, one of the active elements found in marijuana. Some patients find it helps relieve nausea yet takes a long time to work. This product is made for ingestion, do not smoke it. It has the potential for overdose. Use only under the supervision of a doctor

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.

Overseeing all Northwest Compassionate Care dispensaries will be a Head of Dispensary Operations, who will work under the Chief of Business Development. The Security Site Supervisor and Business Manager will work together, the latter being responsible for recordkeeping, staff management, and inventory control procedures. The Security Site Supervisor will be in charge of security and work with the Pharmacist and Business Manager; s/he will be guided by the company's Chief of Security. Together, they will ensure that dispensary staff follows operational, product quality and security protocols. All dispensary staff will meet state and local requirements. As per regulations, all dispensary staff will be over the age of twenty-one, and anyone handling medical marijuana will be free from a conviction on sale or possession of drugs, narcotics, or controlled substances.

All dispensary employees will also work with the company's Quality Assurance Officer to ensure that dispensing and sale protocols are closely followed, i.e. patients receive their correct dose and brand; product labels and inserts are affixed properly; and inventory controls are strong and in place. Each Business Manager will work with the dispensary's Security Site Supervisor, Chief of Security, Information Technology personnel and the dispensary's Inventory Manager to implement and maintain rigorous access control, interior and perimeter security, inventory counts and employment procedures. The Inventory Manager supervises the inventory and recordkeeping of the dispensary's inventory of medical marijuana, product deliveries and product sales. S/he works closely with the Business Manager and Security Site Supervisor.

2. Infrastructure

- 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.

Attachment covers Infrastructure A, B, & C: Floorplan

- d. A HIPAA compliant computer network utilized by all facilities;**

Cybersecurity

Northwest Compassionate Care LLC will have airtight protocols to ensure the privacy and security of clients, employees and partners through the security of electronic data, prevent unauthorized access, loss or theft, as well as to recover lost or stolen data. All records—financial, manufacturing, dispensary, patient, and employee records—will be maintained in electronic format. Computer software will be password protected and accessible only to authorized employees to ensure the integrity of patient records, security measures, combination numbers, passwords, and electronic and/or biometric security systems. The company network will be separate from the public Internet with strong user authentication mechanisms and enforcement systems such as firewalls and web filtering proxies, as well as the restriction of email and internet systems to be used for the company exclusively. Employees may not disclose confidential information concerning the company, its financial, operational and security data, nor any records of patients/caregivers/practitioners to any third parties during or after employment. The IT Network server and all company records and patient information will be stored in a secure locked location. All records will be preserved for five years and provided to the Department upon request.

e. Vehicles that will be used to transport product among cultivating, processing, and dispensing facilities;

Medical marijuana products will be transported between the manufacturing facility and dispensary facilities in a Northwest Compassionate Care armored vehicle. Contents will be in a separate locked area, and not be visible from outside, accompanied by at least two armed Security Guards. One Security Guard will remain with the van and contents at all times. In order to prevent theft or diversion, all transported items will be recorded in a shipping manifest and packaged in large tamper resistant, traceable containers with a GPS tracking device sealed inside that will be monitored at ten second intervals. The product shipment room will be monitored by

video surveillance and controlled by the SAS, allowing only authorized individuals to the room. All transportation will be delivered directly without any stops in between except for refueling or an emergency. The armed transportation personnel will assess the surrounding area for potential threats, to confirm the area is secure and safe for product transaction.

f. Communication systems;

All communication systems will be monitored and close looped on secured networks

g. Hours of operation of each dispensing facility; and

Hours of Operation: The dispensary will be open from 8 AM to 8 PM, seven (7) days a week. Dispensaries will be closed for major legal holidays and reserve the right to close in the event of severe, inclement weather, fire or other natural disaster.

h. Methods of mitigating odors if applicable.

Dispensaries will have no mitigating odors

3. Premises, Resources, Personnel

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.

Attachment: Lease Agreements & Approval Letters

b. Compliance with local regulations regarding sanitation and waste disposal;

NWCC will not be producing product at the dispensary locations and all best practices will be followed regarding sanitation and waste disposal

C. The ability to obtain zoning approval;

_____ With the property secured, and engineers, plans, and local support in place, Northwest Compassionate Care is positioned to begin operations expeditiously upon application 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;

See Attachment

e. A description of the ability or plan to expand any of the areas proposed for dispensing Derivative Products;

As patient needs and populations increase, NWCC is prepared and ready to open Dispensary Locations following Mindfuls proved expertise.

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.

To meet the needs of Northwest Florida Patients, the Applicant's dispensing sites were selected to be geographically distributed across the Northwest Region. The Applicant has chosen dispensing facility locations that are beneficial to the region and local communities. Sites will be located in areas that allow a large number of patients to avail of dispensary services, while addressing the difficulties of non-urban populations in reaching a dispensary. Dispensary sites will be accessible by public transportation and have sufficient and convenient roadway infrastructure and property parking, as appropriate for the type of community—urban, suburban or rural.

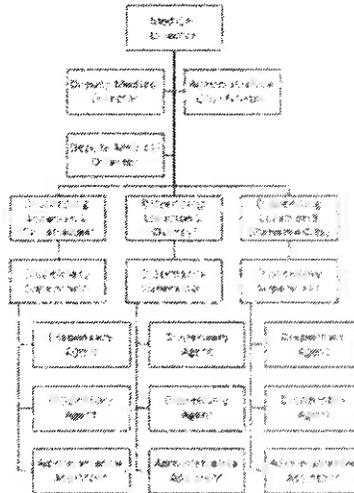
g. A list of current and proposed dispensing staffing, including:

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

- Medical Director
- Deputy Medical Director
- Administrative Coordinator
- Dispensary Supervisor
- Dispensary Agent
- Administrative Assistant

h. An organizational chart illustrating the supervisory structure of the dispensing function of the proposed Dispensing Organization;

Medical/Dispensing Staffing



i. Plans and procedures for loss of key personnel; and

North Florida Group has teamed with an industry leader and plans to use cross training and Department of Health and State of Florida approved training to ensure all key staff are able to competently step in as needed either short term or long term into all key positions.

j. Plans and procedures for complying with OSHA regulations for workplace safety.

Safety of the staff is of the utmost importance to North Florida Group. NFG plans to organize a safety team with members of management and production staff. All regulations including required postings, reporting, MSDA postings, etc will be monitored by the safety team and overseen by administration.

OSHA compliant training will be completed by each member of the safety team and updated as needed.

Attachment: Dispensing and Sales_NWFL

DISPENSING AND SALE

Introduction

Northwest Compassionate Care, LLC is ready, able and committed to comply with all mandated state, city and local laws and regulations relating to the dispensing and sale of medical marijuana product at its proposed dispensing facilities. Each of the dispensary facilities will adhere to all rules and regulations of Florida's Medical Marijuana Program, as well as future Florida State rules and regulations and procedures to be established by the Florida Department of Health Commissioner. Additionally, each dispensary will comply with all rules and regulations of the city and local governments applicable to the specific communities in which each of the four dispensaries is located.

Applicant's Dispensary Experience

Since its inception in 2010, the number of Mindful dispensaries in Colorado (Mindful CO) has quadrupled. Mindful CO brings exemplary dispensary operations and management experience to Northwest Compassionate Care. A recognized industry leader in Colorado, Mindful has four dispensaries across the State, which exemplify strong regulatory compliance, tight security and access control, transparent and equitable labor practices, established community relations and a solid safety record. The State has granted Mindful two additional dispensary licenses in Colorado; Mindful will open these dispensaries in the third and fourth quarters of 2015. In addition, Mindful was awarded a dispensary license in Addison, Illinois. Serving the southwestern Chicago market, it will have the capacity to serve hundreds of patients per day. Mindful is in the preliminary phase of the Addison project and expects a 2015 fourth quarter opening.

Mindful CO's CEO, Managing Partner and Founding Partner possess industry knowledge, business expertise and operational experience. Mindful CO's dispensaries and their individual staff members are noted for servicing their patients and to their communities. In fact, on a company and individual level, Mindful CO is active in neighborhood improvement and charitable projects, such as cash donations to local charities, vegetable gardens open to the public and/or volunteering within the community. Therefore, the Applicant, Northwest Compassionate Care, possesses depth of medical marijuana dispensing experience—including license application and approvals, opening new dispensaries according to projected timelines, patient relations and counseling, recordkeeping, inventory control and reporting, and community outreach.

Dispensary Sites and Design

To meet the needs of Northwest Florida Patients, the Applicant's dispensing sites were selected to be geographically distributed across the Northwest Region. The Applicant has chosen dispensing facility locations that are beneficial to the region and local communities. Sites will be located in areas that allow a large number of patients to avail of dispensary services, while addressing the difficulties of non-urban populations in reaching a dispensary. Dispensary sites will be accessible by public transportation and have sufficient and convenient roadway infrastructure and property parking, as appropriate for the type of community—urban, suburban or rural.

Dispensaries will be located indoors, in enclosed secure facilities that are suitable for dispensing of products to patients and caregivers. The security set-up, and architectural and engineering designs will adequately and suitably reflect the needs and concerns of the community within which the dispensary is located and address the security and access needs of the specific site. Northwest Compassionate Care will ensure that detailed descriptions of plans, procedures and systems will be implemented and maintained for tracking, recordkeeping, record retention and surveillance systems relating to the sale and dispensing at each dispensary. They will be pre-approved by the Department, kept on file and made available for review at any time.

Each dispensary is designed to promote safe product handling, storage and dispensing of medical marijuana. All infrastructure and building components, including site design, infrastructural build, electrical, plumbing and HVAC, will comply with all State and local zoning, building, fire and ADA regulations and codes. Each dispensary Business Manager will supervise that cleaning and security crews fulfill their respective responsibilities so that facilities are clean and safe. Dispensary staff will keep their areas clean as well as follow personal hygiene.

Sites are of sufficient size to facilitate a safe and easy patient flow, from entry through point of sale and exiting. Site size also accommodates the distinct areas of a dispensary, e.g. check-in and security stations; patient waiting room; patient education and counseling area; point of sale area; product vault and product storage; security and cash vaults; private office, employee break rooms and public bathrooms; and a secure receiving area for delivery of incoming products. To accommodate the needs of physically disabled individuals, dispensaries will have ample handicapped accessible parking, ADA-compliant entrances and public bathrooms.

Facility designs will support safe and secure dispensing of medical marijuana. Each dispensary will be housed in a secured and access-controlled facility with 24/7 year-round video surveillance and alarm systems. Dispensary management will coordinate with local officials and law enforcement to provide safe and secure dispensing. Each dispensary will be divided into *limited access* (e.g. patients, caregivers, and staff) and *restricted access* (e.g. Pharmacist, Business Manager, Inventory Manager, and Security Site Supervisor) areas. Armed security guards will supervise the entrance and perimeter of the premises during operational hours. Dispensary designs will also allow staff to visually supervise the various unrestricted and restricted store areas in conjunction with robust electronic surveillance.

Site operations will favor the local community; Northwest Compassionate Care will strive wherever possible to staff the dispensary with local hires. It will support local charities, offer employees paid days off for volunteering and provide the community with free educational workshops on healthy living topics and medical marijuana's background, benefits and safe product use.

Copies of applicable executed and proposed deeds, leases, rental agreements or executed option contracts related to the organization's real property dispensary interests will be submitted. The documents will show that the applicant possesses, or has the right to use, sufficient land, buildings, and other premises, as specified in the application for the dispensing and sale medical marijuana. No dispensary will open before it demonstrates landlord and local governmental authorization to conduct business in the locality and dispense medical marijuana.

Dispensary Facility Staffing and Management

Overseeing all Northwest Compassionate Care dispensaries will be a **Head of Dispensary Operations**, who will work under the **Chief of Business Development**. The Security Site Supervisor and Business Manager will work together, the latter being responsible for recordkeeping, staff management, and inventory control procedures. The **Security Site Supervisor** will be in charge of security and work with the Pharmacist and Business Manager; s/he will be guided by the company's **Chief of Security**. Together, they will ensure that dispensary staff follows operational, product quality and security protocols. All dispensary staff will meet state and local requirements. As per regulations, all dispensary staff will be over the age of twenty-one, and anyone handling medical marijuana will be free from a conviction on sale or possession of drugs, narcotics, or controlled substances.

All dispensary employees will also work with the company's **Quality Assurance Officer** to ensure that dispensing and sale protocols are closely followed, i.e. patients receive their correct dose and brand; product labels and inserts are affixed properly; and inventory controls are strong and in place. Each **Business Manager** will work with the dispensary's Security Site Supervisor, Chief of Security, Information Technology personnel and the dispensary's Inventory Manager to implement and maintain rigorous access control, interior and perimeter security, inventory counts and employment procedures. The **Inventory Manager** supervises the inventory and recordkeeping of the dispensary's inventory of medical marijuana, product deliveries and product sales. S/he works closely with the Business Manager and Security Site Supervisor.

Patient Care

Counseling of Patients: Based on Mindful experience in Colorado, the Applicant will integrate a high level of patient/staff interface into its dispensary operations. The dispensary staff will guide patients from reception through fulfillment. The certified patient and designated caregiver(s) will receive one-to-one counseling by the Pharmacist and/or the Dispensing Assistants under the Pharmacist's direct and continuous supervision. Patients/caregivers will have the opportunity to ask questions during this counseling orientation. The patient/caregiver will learn about the medical marijuana prescription given by the patient's physician, and the product and brand which fulfills that prescription. Specific information relevant to the prescribed medical marijuana will be carefully explained. Patients/caregivers will learn about, but not limited to: specific dosage directions and instructions for administration; warning of adverse effects and/or any potential dangers; a warning about driving, operating equipment, childcare and making important decisions while under the influence of medical marijuana; methods to secure and store the product at the patient's home; a list of excipients; any allergen warning; possible contra-indications; how to recognize what may be problematic usage or substance abuse of medical marijuana and obtain appropriate services or treatment; legal issues, e.g. where the product can and cannot be used according to federal and state regulations; illegality of giving the product to anyone else; how to properly dispose of unwanted, excess, or contaminated medical marijuana product; and other Departmentally mandated warnings or explanatory statements. (See also, *Packaging Insert* below.)

Patient Education: Northwest Compassionate Care will ensure that patients and caregivers are

informed about approved medical marijuana. In addition to orientation and counseling, which provides pertinent and specific information, as described above, each patient and caregiver is given Department-approved resources for additional information. The Applicant will make available a variety of printed materials prepared by professional, medical and/or pharmaceutical experts and approved by the Department. Visual displays at dispensary sites will also remind patients about key facts and information contained in the product inserts. The Pharmacist will always be available to patients and caregivers, responding to their questions on approved medical marijuana during any visit to the dispensary. After the dispensary experience, patient-dispensary interaction continues through patient education seminars and/or electronic communications, (e.g. email, newsletters and social media). The dispensary will send out email communications to help patients/caregivers keep track of timeframes, e.g. that they are nearing the end of their month's supply or that their registration ID might be soon expiring,

Dispensing of Product

Dispensary Quality Assurance Plan (DQAP): The DQA Plan will regulate and monitor the Applicant's medical marijuana dispensing practices to benefit the health, welfare and pain management of each patient within the controlled setting. The DQA Plan will ensure that medical marijuana products are accurately dispensed to the proper certified patient and designated caregiver listed on each prescription. It will identify and prevent mistakes in inventory management and, dispensing. As a robust quality assurance program, DQAP will track incidents of inventory discrepancies, patient complaints, product returns and adverse events; document the investigation on the reason for each incident; and record the appropriate corrective action(s) taken to rectify any errors or events. Daily and monthly record reconciliations will highlight any discrepancies and allow dispensary administrators to detect, identify and correct dispensing errors. Competent and trustworthy dispensary personnel will adhere to the company's recordkeeping and quality assurance protocols. The Quality Assurance Officer, Head of Dispensary Operations, and each on-site Pharmacist and Business Manager will closely supervise this effective multi-faceted quality assurance system at each dispensary to detect, deter and prevent dispensary errors.

Hours of Operation: The dispensary will be open from 8 AM to 8 PM, seven (7) days a week. Dispensaries will be closed for major legal holidays and reserve the right to close in the event of severe, inclement weather, fire or other natural disaster.

Products Brands and Forms: Northwest Compassionate Care will only dispense approved medical marijuana products that have passed the required quality control testing.

Product Storage: The dispensary will store medical marijuana products in a manner that ensures there is no contamination or deterioration of the products or its packaging. All medical marijuana products will be stored in a secure, locked vault located in a restricted area with controlled access. Expiry dates will be checked as a part of regular inventory protocols. Dispensary staff and supporting literature will also advise patients of proper product storage in the patient's home.

Dispensing of Product: The applicant will only dispense approved medical marijuana to certified patients or designated caregivers. The dispensaries will never knowingly allow their products to be resold or transferred to another person. Policies and procedures related to security and control

measures will be in place to prevent diversion, abuse, and other illegal or unauthorized conduct relating to the dispensing and sale of medical marijuana. All approved medical marijuana will be sold through the dispensaries and never given for free, as mandated by the department.

When dispensing product to the patient or designated caregiver, the dispensing staff will place the approved medical marijuana product in a plain outer package. Staff will ensure that each patient receives approved medical marijuana product from no more than two distinct lots for any 30-day supply dispensed. A designated caregiver may bring approved medical marijuana product to his/her certified patient. Dispensing staff will ensure that a certified patient or designated caregiver will not receive more than a thirty (30) day supply until the certified patient has exhausted all but a seven (7) day supply, provided pursuant to any previously dispensed medical marijuana product by any registered organization. Staff will verify each patient's specific dispensing information by consulting the prescription monitoring program registry.

No animals will be allowed into the dispensary except in the case of a service dog or animal. Entry will be permitted if owner presents the service animal's license and the dog or animal is wearing its service vest.

Although the regulations allow certified patients to have up to two designated caregivers, the Applicant will consider whether a delivery service is necessary to accommodate homebound, facility-bound and/or underserved rural patients. The Applicant will work with the Department on approval for product delivery on a case by case basis, and will only dispense via a delivery service with prior written Department approval. In the event that such a delivery service is deemed necessary and approved by the Department, trackable secure deliveries will only be made under Departmental delivery stipulations and only to a certified patient or designated caregiver, as they are the only persons able to lawfully possess medical marijuana

Dispensary Package Labels: Each dispensing facility will firmly attach an approved patient-specific dispensing label to the approved medical marijuana product package. Medical marijuana package labels will be approved by the Department prior to use.

The label will be easily readable and include the:

- name and any registry identification number of the certified patient and designated caregiver;
- certifying practitioner's name;
- dispensing facility name, address and phone number;
- dosing and administration instructions;
- quantity and date dispensed; and
- any recommendation or limitation by the practitioner as to the use of medical marijuana.

Each dispensary package label will also include the following language: Keep secured at all times. This product may not be resold or transferred to another person. This product might impair the ability to drive. **KEEP THIS PRODUCT AWAY FROM CHILDREN** (unless medical marijuana product is being given to a child under a practitioner's care). This product is for medicinal use only. 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.

Safety Insert: Staff will include a Department approved package safety insert with each product package dispensed to a patient. The insert will include the following information: The medical marijuana product and brand; a list of any excipients used; a warning for allergens in the medical marijuana product; possible contraindications; specific dosage directions and administration instructions; warning of adverse effects and/or any potential dangers; instructions for reporting adverse effects as may be determined by the Departmental warning about driving, operation of mechanical equipment, childcare or making important decisions while under the influence of medical marijuana; information on tolerance, dependence, withdrawal and substance abuse; how to recognize what may be problematic usage of medical marijuana and obtain appropriate services or treatment; advice on how to keep the medical marijuana product secure and how to store dispensed medical marijuana at home; language stating that the certified patient may not distribute any medical marijuana product to anyone else; language stating that unwanted, excess, or contaminated medical marijuana product must be disposed of properly; 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.”

Patient Log: In addition to the tracking of all medical marijuana sales in the electronic verification system for the patient/caregiver, staff will maintain a patient log. This log will be provided to each patient and his/her designated caregiver; it will also be available to the patient’s practitioner and the DOH upon request. The log will include specific information about the dispensed medical marijuana products, including the product brand, lot, dosage, administration form and dates dispensed. The log will also include any return of product by the patient or the patient’s designated caregiver.

Sale of Product

Dispensing facilities will be used solely for the purpose of the dispensing and sale of Department approved medical marijuana products and related products necessary for the approved forms of administration of medical marijuana. No additional items will be sold without prior written approval from the Department. Dispensaries will only sell or dispense approved medical marijuana products to a certified patient or his/her designated caregiver and will maintain sufficient approved product on hand to meet the needs of its certified patients.

Northwest Compassionate Care will package, seal and label its five product brands and three forms—capsules, tinctures and cartridges for metered vaporization-- at its manufacturing facility.

Packaging: Northwest Compassionate Care will package the final form of the approved medical

marijuana product at its manufacturing site and deliver all marijuana products to the dispensary facilities in pre-packaged containers that are ready for sale. Transported products arriving from the manufacturing site will be labeled on the outside of every delivered box. Each label's text will be submitted to the Department for their approval, and will include the following information: Name, address and registration number of the registered organization; the medical marijuana product form and brand designation; the THC and CBD content per single dose measured in mg; the product lot unique identifier, i.e. lot number and bar code; container's quantity; date packaged at the manufacturing site; the expiration date; and specific storage conditions for each brand and form. This information will be checked by the Inventory Manager upon receipt of product, confirming that what was sent by the manufacturing site is the same as received by the dispensary and corresponds the dispensary's requisitioning order.

The Pharmacist and Business Manager will ensure that the dispensary's medical marijuana product packaging will not be opened by inventory and dispensing staff. Staff will ensure that no food or beverages will be consumed by patients or caregivers on the premises of a dispensing facility, unless necessary for medical reasons. Original seals will not be broken except for quality testing at an approved laboratory, for adverse event investigations, by the Department, or by the certified patient or designated caregiver. Packaged marijuana products will be child-resistant, tamper-proof/tamper-evident, light-resistant, and in a resealable package that minimizes oxygen exposure.

Inventory Loss or Irregularities: Inventory control is critical in maintaining full compliance and integrity of sales. An inventory audit will be conducted at the close of each business day. The physical inventory is matched against the internal Point of Sale (POS) system and the State tracking system. Discrepancies will be thoroughly investigated to identify where the loss occurred. All errors will be documented and additional training will be conducted to avoid future occurrences. If the discrepancy requires investigation, internal camera records will be reviewed and staff interviewed.

This communication will include the corrective action taken to resolve the loss.

Closure Procedures: In the event that the Applicant elects to cease operation of all permitted activities at one, some or all of its dispensaries, the Applicant will notify the Department in writing at least 120 days prior to the anticipated date of closure of the facility or facilities. This written notice will include a closure plan and timetables, which will be subject to the Department's approval. No action will be taken to close any dispensing facility prior to Department approval of the closure plan. The plan will describe the procedures and actions the Applicant will take to: notify affected certified patients and designated caregivers of the closure; properly destroy, transfer, or otherwise dispose of all medical marijuana products; maintain and make available to the Department all required records for a period of five years; and comply with any other Departmentally required conditions.

Patient Verification Protocols

Only patients and designated caregivers who have been certified by a registered practitioner, and who have received a registration identification card from the Department will receive dispensed medical marijuana.

The Applicant's dispensaries will only recognize practitioners who have registered and been approved by the Department. Similarly, Northwest Compassionate Care's dispensaries will only serve patients who have been certified by these registered practitioners, and only conditions defined in the Department's regulations. The patient must remain under the practitioner's continuing care for the approved condition in order to receive medical marijuana.

Several measures and protocols will be employed to verify patient identification and prescriptions. First, upon entry into the dispensing facility, the Front Desk Manager will review all documentation and identification cards, to ensure compliance. The Front Desk Manager will also confirm that the patient has not exceeded mandated purchase limits. Patient information will be verified with the State electronic system to confirm that the patient is in good standing. All employees will be trained to identify counterfeit identification cards. Additionally, the dispensary will employ *VeriScan* technology to validate the authenticity of identification cards.

Hard copies of all patient records/caregiver information will be kept secure. Employees will be trained on the requirements of the *Health Insurance Portability and Accountability Act* (HIPAA) and the *Patient Protection and Affordable Care Act* (PPACA). Compliance and patient confidentiality will be highlighted in this training. All sales will be tracked and documented in the applicant's Point of Sale (POS) system. As with the patient's hardcopy files, access to sensitive information in the POS system will be restricted.

Dispensing Record Keeping

All medical marijuana sales will be tracked in the company's POS system and/or the Department's electronic verification system. The following information will be recorded: the dispensary registration number; the dispensary staff's registration number; quantity, type, and strain of marijuana dispensed; identity and registration ID of the individual to whom the marijuana was dispensed; and the date and time of each transaction. In cases of denied service, all essential information will be recorded, including the dispensary registration number; the dispensary staff's registration number; identify and ID registration number of the individual denied; and the date and time of the denied service. Daily inventory and sales reconciliations will take place and each day's records will be sent by the Business Manager or the Inventory Manager to the Department at least once in every 24 hour period. Monthly inventory and sales audits will also be performed. There will be a strict protocol for the reporting of any discrepancies in sales and inventory recordkeeping; it is described in **Section Recordkeeping**, of the Operating Plan.

Dispensing Access Protocols

The dispensary will be tightly monitored. This includes access to the dispensary building/facility as well as access in all restricted interior rooms. Patients will be required to provide the necessary ID cards and registration materials to security prior to entering the facility. Patients will then register with the front desk staff prior to entering the dispensing room, a limited access area.

Dispensary Assistants will advise one patient at a time. Assistants will check patient identification as a secondary check and explain approved medical marijuana usage, the types of strains, administration methods, dosages and responsible consumption.

No actual marijuana products will be on display in the dispensing room, only high-resolution images of dispensable products will be provided. Informational materials will be provided to assist the patient in making informed product selections. The patient's selections are then processed on the Point of Sale/Seed-to-Sale terminal and payment is provided at that time. The sale information is then transmitted to the restricted access inventory room where the inventory staff, with oversight by the Pharmacist or Inventory Manager, under the supervision of the Pharmacist, prepares the order. Upon completion, the Inventory Manager places the order in the exit packaging, which is always nondescript, sealed and opaque so that the nature of the package is not a target outside of the facility.

Storage of Product

All safes, vaults or other equipment or areas for storage of medical marijuana products will be secured and continuously monitored. Access to inventory vault(s) will be restricted and will be supervised overall by the Security Site Supervisor. Only the Site Supervisor, Pharmacist, Inventory Manager and Business Manager are allowed access or unless they supervise an entering inventory staff member. The storage room will be monitored for temperature and humidity to ensure product quality. The Inventory Manager will ensure that all stored products have not passed their expiration date; any expired product will be handled in the same manner as *returned* products (below).

Storage of Returns: Northwest Compassionate Care will secure the handling and record the storage of any returns of medical marijuana product previously sold from the Applicant's dispensaries. Each dispensary will document and investigate product returns, which will be stored temporarily in a delineated section of the dispensary's storage space. Medical marijuana product must be destroyed in compliance with Florida's disposal regulations. Returned or unusable medical marijuana will be sent back to the manufacturing site for proper disposal, using the organization's secure product delivery transportation system. Records on returns and disposal will be kept at the dispensary, on the transport manifest and at the manufacturing site.

Access to the Dispensary

Facility access will be restricted and controlled. A detailed description of the comprehensive security systems and apparatus are described in the *Security and Control* Plan attached to this Operating Plan. Registered employees will only be allowed on the premises of his/her dispensing facility and must display the company staff identification card at all times. Certified patients or designated caregivers will be allowed into the facility upon display of their registry identification card, issued by the Department, to the entry way Security Guard. Other persons may enter the facility only if they have written authorization from the Department. Such authorized persons will not be allowed to enter until they obtain a visitor identification badge from a dispensing facility employee. A dispensing facility employee will escort and monitor the visitor at all times while the visitor is in the dispensing facility. The visitor identification badge shall be visible at all times. The dispensing facility will require the visitor to return the identification badge to a dispensing facility

employee upon exiting the dispensing facility.

Visitor Log: The dispensing 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 Department at all times during operating hours and upon request. If an unforeseen circumstance, such as the need to bring a child, requires the presence of a visitor and makes it impractical for the dispensing facility to obtain a waiver, the dispensing facility will 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.

NWGroup, Inc.
1882 Capital Circle, NE
Suite 102
Tallahassee, FL 32317

July 5, 2015

Mr. Kelly Bowman, Owner/Manager
B&B Investment Properties of Florida, LLC
Quincy, Fl, 32351

RE: Industrial Building 1633 Highbridge Road

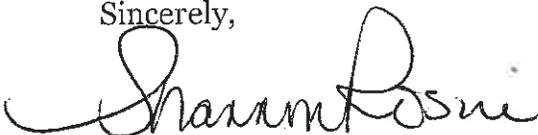
Dear Mr. Bowman,

This letter is confirm that our company, NWGroup Inc, is interested in leasing your property located at 1633 Highbridge Road, Quincy, Florida, 32351 for the purposes of cultivating, processing, or dispensing of low- THC Cannabis and derivative products as authorized under Ch. 381.986 Florida Statutes. The Florida Department of Health is requiring all applicants for a medical cannabis license to provide documentation that the owner of the leased property grants their consent for the use of the property for these purposes. Therefore, please sign the letter below consenting to the use of the property for these purposes authorized under Florida law.

In addition, the Department requests documentation that any mortgage holder or lien holder has been notified of the use of the property for these purposes. Their consent is not required. Please provide us with an email or written confirmation you have provided a copy of this letter to any lien or mortgage holder on the property to be leased

Thank you for your assistance.

Sincerely,

A handwritten signature in black ink, appearing to read "Shannon Rosier". The signature is fluid and cursive, with a large initial "S" and "R".

Shannon Rosier, CEO
NWGroup, Inc.

COMMERCIAL LEASE

This Lease made this 28th day of December 2010 by and between Bruce P. Warren, 2106 North Harbour Drive, Lynn Haven, FL 32444, herein referred to as Landlord, and Stephen W. Duncan/LA DOC FL, LLC (DBA Resolutions Weight Loss Center), his successors and assigns whose mailing address is P.O. Box 14225, Tallahassee, FL 32317 referred to as Tenant.

Tenant hereby offers to lease from Landlord the premises situated in County of Bay, State of Florida, described as 1212 West 23rd Street, Panama City upon the following terms and conditions.

month-to-month 

1) **Term and Rent.** Landlord desires the above premises on a 26-month basis, commencing January 1st, 2011 for a rental payment of ~~3000.00~~ *month-to-month* per month plus tax due on the first day of each month during the term of this lease. All rental payments shall be made to the Landlord at the above specified address. A 10% late fee will be assessed in the event the rental payment is not received by the landlord by the 1st of the month.

No later than 30 days prior to the end of the lease term, the Tenant shall give the Landlord written notice of whether it intends to vacate the premises or elect a renewal. If Tenant fails to give 30 days prior written notice of its intent to vacate at the end of the lease term, it shall be responsible for an additional month's rental payment to Landlord.

2) **USE.** Tenant shall use and occupy the premises for a medical office. The premises shall be used for no other purpose. Landlord represents the premises may lawfully be used for such purpose.

3) **CARE AND MAINTENANCE OF PREMISES.** Tenant acknowledges that the premises are in good order and repair, unless noted herein, and accepts the premises in "as is" condition. Tenant agrees that during the term of this lease, he will, at his own expense keep all non-structural portions of the premises in good state of repair and condition (including repair of nail and screw holes or other damage to interior walls and doors caused by tenant), ordinary wear and tear excepted. Landlord agrees to keep in good repair and condition the foundation, exterior walls, underground plumbing, roof, sidewalks, and storefront. The Tenant agrees to maintain the air conditioning and electrical systems. Any damage or injury thereto caused by or resulting from any negligence, act, or omission of the Tenant or any of the tenant's agents, employees, licensees, invitees, and customers will be the responsibility of the Tenant and the Tenant shall indemnify and hold harmless the Landlord therefore. Tenant shall be obligated to pay all costs of minor day-to-day maintenance and repairs to the premises such as, but not limited to, broken glass, light bulbs, ballasts, stopped up toilets, leaking faucets, air conditioner filters, and so on.

4) **ALTERATIONS.** Tenant shall not, without first obtaining the written consent of the Landlord, make any additions, or improvements in, to, or about the premises. The Tenant shall be responsible for payment of expenses associated with any alterations to the premises.

5) **ORDINANCES AND STATUTES.** Tenant shall comply with all statutes, ordinances, and requirements of all municipal, state, and federal authorities now in force, or which may hereafter be in force, pertaining to the premises, occasioned by or affecting the use thereof by Tenant. Tenant shall not commit, or allow to be committed, any waste on the premises, create or allow any nuisance to exist on the premises, or allow the premises to be used for any unlawful, improper, or offensive purpose, including illegal drug activity, which shall be subject to all available state penalties. No flammable or explosive material, or hazardous or toxic waste, material, or substance, including asbestos, petroleum, or any petroleum by-products, which is or becomes regulated by any local government authority, any agency of the State of Florida or of the United States Government, shall be allowed or kept within the premises unless Landlord's prior written approval is obtained. No animal of any kind shall be allowed or kept within the premises, with the exception of seeing eye dogs.

6) **ASSIGNMENT OR SUBLETTING.** Tenant shall not assign this lease or sublet any portion of the premises without prior written consent of the Landlord, which shall not be unreasonably withheld. Any such assignment or subletting without consent will be void and, at the option of the Landlord, may terminate this lease.

7) **UTILITIES.** Tenant shall pay for utility charges as they come due, including those for electricity, water and sewer charges, telephone and trash.

8) **ENTRY AND INSPECTION.** Tenant shall permit Landlord or Landlord's agent to enter upon the premises, at reasonable times and upon reasonable notice, for the purpose of inspecting same, and will permit Landlord at any time within sixty (60) days prior to the expiration of this lease, to place upon the premises any usual "For Lease" signs, and permit persons desiring to lease the same to inspect the premises thereafter.

9) **POSSESSION.** If Landlord is unable to deliver possession of the premises at the commencement hereof, Landlord shall not be liable for any damage caused thereby, nor shall this lease be void or voidable, but Tenant shall not be liable for any rent until possession is delivered.

10. INDEMNIFICATION OF LANDLORD. Landlord shall not be liable for any damages or injury to Tenant or any other person or to any property occurring on the demised premises or any part thereof, except for the Landlord's negligence, and Tenant agrees to hold Landlord harmless from any claims for damages. Tenant acknowledges that landlord does not provide security guards, security alarms, or other devices on the premises.

11. INSURANCE. Tenant, at its expense, shall maintain plate glass and public liability insurance, including bodily injury and property damage, insuring the Tenant and Landlord with minimum coverage as follows: Comprehensive general liability with combined single limit of liability for bodily injury and property damage of \$1,000,000.00 to include \$5000.00 premises medical payments, as well as its own personal property hazard insurance and theft coverage. Tenant shall provide Landlord with a Certificate of Insurance showing Landlord as additional insured. The Certificate shall provide for a ten-day written notice to Landlord in the event of cancellation or material change of coverage. To the maximum extent permitted by insuring policies which may be owned by Landlord or Tenant, Tenant and Landlord, for the benefit of each other, waive any and all rights of subrogation which might otherwise exist. Landlord shall keep the building insured against loss or damage by fire or other hazards in an amount not less than 80% of the full insurable value of the building.

12. EMINENT DOMAIN. If the premises or any part hereof or any estate therein or any part of the building materially affecting Tenant's use of the premises shall be taken by eminent domain or sold to any governmental agency, this lease shall terminate on the date when title vests pursuant to such taking or sale. The rent, and any additional rent, shall be apportioned as of the termination date, and any rent paid for any period beyond that date shall be repaid to Tenant. Tenant shall not be entitled to any part of the award for such taking or any payment in lieu thereof, but Tenant may file a claim for any taking of fixtures and improvements owned by Tenant, and for moving expenses.

13. DESTRUCTION OF PREMISES. In the event of a partial destruction of the premises during the term hereof, from any cause, Landlord shall forthwith repair the same, provided repairs can be made within sixty (60) days under existing governmental laws and regulations, but such partial destruction shall not terminate this lease except that Tenant shall be entitled to a proportionate reduction of rent while such repairs are being made, based upon the extent to which the making of repairs shall interfere with the business of Tenant on the premises. If such repairs cannot be made within sixty (60) days, Landlord, at his option, may make the same within a reasonable time, this lease continuing in effect with the rent proportionately abated as aforesaid, and in the event that the Landlord shall not elect to make such repairs which cannot be made within sixty (60) days, this lease may be terminated at the option of either party. In the event that the building in which the demised premises may be situated is destroyed to an extent of not less than one-third of the replacement cost thereof, Landlord may elect to terminate this lease whether the demised premises be injured or not. A total destruction of the building in which the premises may be situated shall terminate this lease.

14. LANDLORD'S REMEDIES ON DEFAULT. If Tenant defaults in payment of rent, or any additional rent or defaults in the performance of any other of the covenants or conditions hereof, Landlord may give Tenant notice of such default, and if Tenant does not cure such default within fifteen (15) days, after the giving of such notice (or if such other default is of such nature that it cannot be completely cured within such period, if Tenant does not commence such curing within such fifteen (15) days and thereafter proceed with reasonable diligence and in good faith to cure such defaults), then Landlord may terminate this lease immediately thereafter. On the date specified in such notice, the term of this lease shall terminate, and Tenant shall then quit and surrender the premises to Landlord, but Tenant shall remain liable for the balance of the rent due for the term and any options exercised, plus legal interest on amounts past due, together with any other damages resulting from the default other than a default in payment of rent as hereinafter provided. If the lease shall have been so terminated by Landlord, Landlord may at any time thereafter, resume possession of the premises by any lawful means, and remove Tenant or other occupants and their effects. No failure to enforce any term shall be deemed a waiver.

15. SECURITY DEPOSIT. The \$750.00 deposit will be retained by Landlord as a security deposit for the performance of the Tenant's obligations under this lease, including, without limitation, the surrender of possession of the premises to Landlord as herein provided. Such amount shall be returned to the Tenant, without interest, within ten (10) days after the expiration of the term if Tenant has fully and faithfully carried out all of the items, covenants, and conditions of this leases. If Landlord applies any part of the deposit to cure any default of Tenant, Tenant shall, on demand, deposit with Landlord the amount so applied so that the Landlord shall have the full deposit on hand at all times during the term of this lease.

16. TAXES. Tenant agrees to pay all taxes levied against the personal property and trade fixtures of the Tenant in and about the demised premises. Landlord will be responsible for property taxes levied on real estate.

17. ATTORNEY'S FEES. In case suit should be brought for the recovery of the premises, or for any sum due hereunder, or because of any act which may arise out of the possession of the premises, by either party, the prevailing party shall be entitled to all costs incurred in connection with such action, including reasonable attorney's fee.

18. NOTICE. Any notice which either party may or is required to give shall be given by mailing the same, postage prepaid, to Tenant at the premises, or Landlord at the addresses shown above, or at such other places as may be designated by the parties from time to time.

19. HEIRS, ASSIGNS, SUCCESSORS. This lease is binding and inures to the benefit of the heirs, assigns, and successors in interest to the parties.

20. SUBORDINATION. This lease is and shall be subordinated to all existing and future liens and encumbrances against the property.

21. RADON GAS. 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. Tenant acknowledges receipt of this notice prior to execution of this lease.

The Landlord has not undertaken any independent study on the radon levels in this building. The above notice should not be construed or interpreted as a notice that the premises are exposed to quantities of radon which pose a health risk. The notice is included in this lease simply because radon disclosures are now required in all leases pursuant to Florida law.

22. SIGNS. All signs are subject to Landlord's prior approval and architectural control as to construction, maintenance, location, and aesthetics, which shall not be unreasonably withheld and are at the Tenant's expense. Tenant shall promptly remove all signs, at Tenant's expense at the expiration or termination of this lease.

23. LANDLORD NOT A PARTNER. It is expressly understood that Landlord shall not be construed or held to be a partner or associate of Tenant in the conduct of the business; it being expressly understood that the relationship between the parties hereto is and shall remain at all times that of Landlord and Tenant.

24. SUBMISSION OF LEASE. The submission of this lease for examination does not constitute an option for the demised premises, and this lease shall not become effective until fully executed by both parties. This lease is subject to withdrawal or prior lease or sale, without notice, by Landlord.

25. RECORDING. Tenant shall not record this lease or a memorandum thereof without the written consent of Landlord. Upon request of landlord, Tenant shall join the execution of memorandum of this lease for the purpose of recordation. Said memorandum of this lease shall describe the parties, the demised premises, and the lease term, and shall incorporate this lease by reference.

26. TERMS INCLUSIVE. As used herein, the terms "Landlord" and "Tenant" shall include the plural, and the masculine, shall include the feminine and neuter whenever the context so requires or admits.

27. TIME. It is understood and agreed between the parties hereto that time is of the essence in the performance of all terms and provisions of this lease.

28) ENTIRE AGREEMENT. The foregoing constitutes the entire agreement between parties and may be modified only by a writing signed by both parties.

IN WITNESS WHEREOF, Landlord and Tenant have executed this lease agreement the day and year first above written.

Signed, sealed, and delivered in our presence as witnesses:

LANDLORD:
Bruce P. Warren

Subray M. W.
T. J. W.

B. P. Warren

Date: 28 Dec 10

TENANT:
Stephen W. Duncan

Subray M. W.
T. J. W.

Stephen W. Duncan

Date: 12-28-10

Addendum To Commercial Lease Dated 12/28/10:

(Page 1, para 2) Use. Tenant may use and occupy the premises for dispensing medical marijuana, assuming all federal, state and local ordinances are met by tenant.


Bruce P. Warren, Landlord
7/3/15

LEASE EXTENSION AGREEMENT

THIS INDENTURE, made this 21st day of January, 2014, by and between Costin-Hayward Partnership, a Florida general partnership, hereinafter called "LESSOR", whose address for the purposes of Notice under this Lease is 2121 Killarney Way Ste. G, Tallahassee, Florida, 32309, and NFWS, LLC, hereinafter called "LESSEE", whose address for the purposes of Notice under this Lease is 1345 Cross Creek Way, Tallahassee, Florida, 32301.

WITNESSETH

WHEREAS, LESSEE desires to extend the existing lease from LESSOR and the LESSOR is agreeable to said extension of the certain premises hereafter described on the terms, covenants, and conditions set forth in this agreement;

NOW THEREFORE, in consideration of the rents reserved herein and the mutual covenants, terms, conditions, and agreements herein set forth, the parties agree as follows:

1. AGREEMENT TO LEASE: DESCRIPTION OF PROPERTY: The LESSOR leases and demises unto the LESSEE, and the LESSEE rents and hires from the LESSOR, the following described commercial space: 1345 Cross Creek Way consisting of 2704 square feet, located in Tallahassee, Leon County Florida.

2. TERMS OF LEASE: RENTAL: The terms of the Lease and the rent agreed to be paid by the LESSEE in consideration of the Lease are as follows:

A. The term of this Lease which began on October 1, 2013 and shall be extended to now end at 12:00 midnight on March 31, 2015 with payments as follows:

1. The LESSEE shall continue to pay to the Lessor the monthly rental of ~~3,000.00~~ plus the then applicable sales tax (presently ~~9%~~ equaling ~~270.00~~) per month, totaling ~~3,270.00~~. This rental shall continue unchanged during the term of the lease.

B. LESSEE shall pay to LESSOR at 2121 Killarney Way Ste. G, Tallahassee, FL, 32309, or at such other address as LESSOR from time to time shall designate, as rental for the premises, in lawful money of the United States of America, as follows:

C. All payments due from LESSEE to LESSOR under the terms of this Lease, including but not limited to monthly rental payments, shall be paid promptly when due to LESSOR at such place as LESSOR from time to time may designate in writing. If any payment is not received by LESSOR by 12:00 midnight on the fifth (5th) day following the day on which payment is due, a late fee shall be due and payable by LESSEE to LESSOR as additional rent

equal to five percent (5%) of the delinquent payment, plus one percent (1%) per day for each day (including the day payment is received) the payment is delinquent.

3. TAXES: LESSOR shall be responsible for all municipal, county, or state taxes assessed during the term of this Lease on the real property constituting the demised premises. LESSEE agrees to pay all taxes levied against the personal property and trade fixtures of the LESSEE in and about the demised premises.

4. ADDITIONAL LESSEE OBLIGATIONS: In addition to the payments required herein as rent to the LESSOR, the LESSEE also shall pay the following:

- A. All occupational licenses, including state, county, municipal, or any licenses necessary for business to be carried on in the demised premises.
- B. All utility services, including deposits, provided to the premises including, but not limited to, gas, and telephone, as they from time to time shall accrue and be due and payable during the term of this Lease according to separate meters therefore.
- C. Janitorial services for the unit leased.

5. USE OF PREMISES: LESSEE may use the premises for all lawful purposes. Once the initial improvements are made by the Lessee, thereafter interior walls, floors, and ceiling will remain, and be maintained in the same condition. No additional painting or permanent decorating of the walls, floors, and ceilings are allowed without the Lessors approval which shall not be unreasonably withheld. LESSEE shall, at its expense, comply with the requirements of all applicable municipal, state, and federal laws, ordinances, rules, and regulations pertaining to LESSEE's particular use of the premises.

6. LESSOR OFFERING PROPERTY FOR SALE OR RENT: Sixty (60) days prior to the expiration of the primary term of this Lease or any extension thereof, LESSOR shall have the right to show property to prospective purchasers or tenants during normal business hours. LESSOR shall have the right to place "For Sale" or "For Rent" signs up to four feet by eight feet (4' x 8') on property offering property to public.

7. MAINTENANCE AND REPAIRS: LESSOR shall be responsible for the exterior roof and walls. LESSEE shall be responsible for all other interior maintenance on the office, including replacement of light bulbs, janitorial services, changing A/C filters on at least a monthly basis, and providing pest control.

8. INSURANCE: LESSEE shall maintain, at its own expense, public liability insurance on

the premises in an amount acceptable to the LESSOR, but not less than \$250,000/\$750,000. LESSOR shall be responsible for the payment of fire and extended coverage on the building, exclusive of contents.

9. DESTRUCTION:

A. In the event of the destruction or damage to the extent of forty percent (40%) of the value of the building and the improvements on the leased premises by reason of fire, the elements, or other casualty, the LESSOR shall have the option to either terminate this Lease or immediately undertake to restore the premises to their former condition and shall complete such restoration as expeditiously as possible.

B. If the leased premises are in such condition that they are not usable for the use stated above by reason of destruction or damage, and if it shall not be possible to be restored to a usable condition within NINETY DAYS (90) then this Lease shall, at the option of the LESSEE, terminate, in which event both parties will be thenceforth released from all liability for further performance of any of the obligations imposed hereby. LESSEE may waive his option to terminate this Lease. If LESSEE does not terminate this Lease and if such damage or destruction shall be restored to a useable condition within the time permitted after such damage and the LESSEE shall continue to operate his business in the demised premises to the extent reasonably practicable, provided however, if such damage shall render the premises untenable to such an extent as to require the LESSEE to curtail his business operation, then a just portion of the rental reserved herein shall be suspended or abated during the period of restoration. In the event that both parties are unable to agree upon the abatement of rental contemplated hereby, such abatement shall be determined by arbitration and the cost thereof divided between the parties.

10. LESSOR'S ENTRY FOR INSPECTION: LESSOR reserves the right to enter on the premises at reasonable times to inspect the property. Should the Lessee change the door locks, copies of the new keys shall be provided to Lessor.

11. ASSIGNMENT AND SUBLETTING. LESSEE may not assign this Lease and sublease the whole or any part of said premises without the written consent of the LESSOR, which shall not be unreasonably withheld.

12. CONDEMNATION: In the event that the whole or any part of the premises are condemned or taken for any public or quasi-public use, either LESSOR or LESSEE at their option, may terminate this Lease by giving the other party a ninety day (90) written notice. Any condemnation proceeds shall be the property of the LESSOR.

13. DELIVERY ACCEPTANCE AND SURRENDER OF PROPERTY: LESSOR represents that the premises are clean and in a fit condition for use. LESSEE agrees to accept the premises on possession as in a good state of repair and in sanitary condition. He agrees to surrender the premises at the end of the lease term, if the Lease is not renewed, to the LESSOR in the same condition as when he took possession, allowing for reasonable use and wear, and damage by acts of God, including fire and storms. LESSEE agrees to remove all business signs and symbols placed on

the premises by LESSEE before return of the premises, and to restore to the LESSOR the portion of the premises on which the signs and symbols were placed in the same condition as before their placement.

14. LEGAL REPRESENTATIVES, SUCCESSORS, AND ASSIGNS: All the covenants, agreements, provisions, conditions, and undertakings contained in this Lease shall extend to and be binding upon the respective heirs, executors, successors, and assigns of LESSOR and LESSEE, the same as if they were in every case named and expressed, and shall be construed as covenants running with the land; and that wherever in the Lease reference is made to either LESSOR and LESSEE hereto, it shall be held to including and apply to (wherever and whenever applicable) the heirs, executors, successors, personal or legal representatives, and assigns of LESSOR or LESSEE, the same as if in each and every case so expressed.

15. QUIET ENJOYMENT: LESSOR covenants and agrees with LESSEE that so long as LESSEE shall pay all rental promptly as the same shall become due and payable and shall comply with its other covenants and agreements as herein contained, LESSEE shall quietly enjoy the use and occupancy of the demised premises, free and clear of all claims of all persons whatsoever.

16. DEFAULT:

A. The occurrence of any of the following shall constitute a default under this Lease by LESSEE:

1. The failure of LESSEE to make any rental payment when due, if such rental payment is not made within fifteen days (15) after LESSEE received notice of such failure from LESSOR; or

2. The failure of LESSEE to perform or observe any other term, covenant, or condition to be performed or observed by LESSEE hereunder, if such failure is not cured or corrected within said thirty day (30) period, then such failure shall not constitute a default hereunder if LESSEE commences the cure or correction thereof within the said thirty day (30) period and diligently prosecutes the same to completion; or

3. The filing by LESSEE of a Voluntary Petition in Bankruptcy or a Petition seeking any reorganization, arrangement, or similar relief under any statute relating to bankruptcy or insolvency; the adjudication of LESSEE as a bankrupt or insolvent; the making by LESSEE of a general assignment for the benefit of creditors; or the appointment of a receiver for a substantial portion of the assets of LESSEE unless removed within thirty days (30) after such appointment.

B. In the event of default by LESSEE hereunder, LESSOR may:

1. Without terminating the Lease, enter upon and take possession of the premises and rent the premises for reasonable rentals for the account of LESSEE, and after paying from rents collected the reasonable costs of such entry, renting, and collection, and the cost of any necessary repairs made by LESSOR which LESSEE is obligated to make hereunder, apply the remainder of the rents collected to the amounts due and to be come due from LESSEE hereunder; or

2. Terminate this Lease by giving notice of such termination to LESSEE, which termination shall be without prejudice to any accrued indebtedness hereunder owing by LESSEE to LESSOR; or

3. Take any other action and pursue any other remedy which may be available to LESSOR under the law.

C. LESSOR shall be in default if LESSOR fails to perform or observe any term, covenant, or condition to be performed or observed by LESSOR hereunder and if such failure is not cured or corrected within thirty days (30) after LESSOR receives written notice from LESSEE stating the nature and extent of such failure; provided, however, that if LESSOR's failure cannot reasonably be cured or corrected within said thirty day (30) period, then such failure shall not constitute a default hereunder if LESSOR commences the cure or correction thereof within said thirty day (30) period and diligently prosecutes the same to completion.

D. In the event of default by LESSOR hereunder, LESSEE may:

1. Terminate this Lease by giving notice of such termination to LESSOR, in which event LESSOR shall refund to LESSEE any unearned rent paid in advance by LESSEE; or

2. Take any other action and pursue any other remedy which may be available to LESSEE under the law.

E. The failure of either party to exercise any remedy in the event of default by the other party shall not constitute a waiver of the right to exercise the same in the event of a subsequent default by the other party.

F. If either party files an action or brings any proceeding against the other under or in any manner arising out of this Lease, the party in whose favor final judgment shall be entered shall be entitled to recover from the other all Court costs and other expenses incurred in connection therewith, including reasonable attorney's fees for said action or appeal of same.

17. EFFECT OF WAIVER: LESSOR's or LESSEE's waiver of breach of one term, covenant, or condition of this Lease is not a waiver of breach of others, nor a subsequent breach of the one waived. LESSOR's acceptance of rent installments after breach is not a waiver of the breach, except of breach of the covenant to pay the rent installment or installments accepted by LESSOR.

18. FIXTURES: LESSEE may, upon the termination of this Lease, remove all fixtures, appliances, and improvements belonging to it, provided that any damage or

disfigurement to the premises caused by such removal shall be promptly repaired at the sole expense of the LESSEE.

19. ALTERATIONS: LESSEE covenants that he will not make any alterations or additions to or on the demised premises which might impair the structural soundness of the building thereon. LESSEE will not make any other alterations or additions without the written consent of the LESSOR.

20. HOLDING OVER BY LESSEE AT WILL: It is especially agreed and understood that any holding over or continued use or occupancy by LESSEE, his successors and assigns, of the herein leased premises, after the expiration of this Lease, shall operate and be construed as a tenancy from month to month.

21. LIENS: LESSEE shall keep the demised premises free from any liens arising out of any work performed, materials furnished, or obligations incurred by LESSEE.

22. NO PARTNERSHIP: LESSOR does not, in any way, or for any purpose, become a partner of LESSEE in the conduct of his business, or otherwise, or joint venturer or a member of a joint enterprise with LESSEE. The provisions of this Lease, if any, relating to the percentage rent payable hereunder are included solely for the purpose of providing a method whereby the rent is to be measured and ascertained.

23. PARTIAL INVALIDITY: If any term, covenant, or condition of this Lease or the application thereof to any party or circumstance shall, to any extent, be invalid, or unenforceable, the remainder of this Lease, or the application of such a term, covenant, or condition to parties or circumstances other than those as to which it is held invalid or unenforceable shall not be affected thereby and each term, covenant, or condition of this Lease shall be valid and enforced to the fullest extent permitted by law.

24. SUBORDINATION TO MORTGAGES: LESSEE agrees that this Lease shall be subordinate to any mortgages that may hereafter be placed upon the premises by the LESSOR, provided that the mortgagee named in such mortgages shall agree to recognize this Lease in the event of foreclosure if the LESSEE is not then in default.

25. AMENDMENT: This Lease shall not be amended or modified, in whole or in part, except by a written agreement signed by LESSOR and LESSEE.

26. MISCELLANEOUS: The paragraph headings or captions herein are for convenience or reference only and shall not limit, modify, amplify, or in any way affect any of the provisions hereof. All references herein to the LESSOR in the

singular shall include the plural and in the neuter shall include the masculine and feminine; such references shall likewise apply to an individual, corporation, partnership, and/or other entity. This Lease constitutes the entire agreement of the parties with respect to the subject matter hereof and supersedes all prior negotiations, commitments, representations, and agreements relating thereto.

27. SIGNS (Store Fronts): LESSEE shall not, without LESSOR's prior written consent:

1. Make any changes to the store front; or
2. Install any exterior lighting, decorations or paintings; or
3. Erect decorations or advertising media or any type which can be viewed from the exterior of the demised premises, excepting only dignified displays of customary type of its display windows.

28. NOTICES: All notice provided for herein shall be given in writing and shall be delivered in person or by United States mail, certified, to the other party, and shall be deemed given when so mailed. All notices shall be sent: if to LESSOR, 2121 Killarney Way Ste. G, Tallahassee, Florida, 32309; if to LESSEE, at 1345 Cross Creek Way, Tallahassee, Florida, 32301 or elsewhere as specified to Lessor in writing.

29. OPTION TO RENEW THIS LEASE: The LESSEE shall have the right to renew this lease for an additional three years, provided the LESSEE notifies the LESSOR a minimum of one month prior to its termination at a rental amount to be agreed to by the parties.

Signed, sealed and delivered
in the presence of:

witness

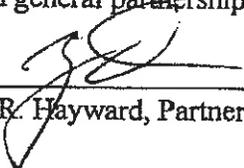
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witness

LESSOR

COSTIN-HAYWARD PARTNERSHIP
a Florida general partnership

By 
Tom R. Hayward, Partner

LESSEE

NFWS, LLC

By _____
Stephen Duncan, M.D., Manager

NW Group

Application for Low THC Cannabis Dispensing Organization Approval

Medical Director:

a. Specialty area, if any:

Stephen Duncan, MD
Obstetrics and Gynecology
Bio-Identical Hormone Specialist
High Risk Obstetrics
Pain Management with Compounded Products

George Arcos, MD
Anesthesiology
Pain Management
Surgical Interventional Pain Management

Kirk Mauro, MD
Rehabilitation and Physical Medicine
Disability Evaluation
Independent Medical Examiner

b. Experience with epileptic patients:

Dr. Mauro's work in the area of disability evaluation has included multiple epileptic patients over the years. He has evaluated their ability to function both in the work place and at home and provided guidance for seizure control and living independence.

This is best achieved by searching for triggers and evaluating currently available medications realizing that a multi-drug cocktail may be needed which can have numerous mild to severe side effects.

With this experience Dr. Mauro realizes all too well the need for a better form of treatment. He believes cannabis based medications have great potential.

c. Experience with cancer patients:

As part of Dr. Arcos' teaching responsibilities, while working as clinical professor at University of Florida College of Medicine, was to work with Oncologists in managing long term pain issues to due cancer and the resultant issues associated with chemo and radiation therapy.

He realizes that the neuropathic pain caused by the Platinum and Taxane based chemotherapies can be debilitating and can often cause patients to stop therapy prematurely or be so taxed that it affects their overall health thus slowing the positive effects of the medications. Until now, current pain control modalities have not been effective enough to control these side effects. Studies using THC/CBD based drugs have been shown to improve out-comes.

According to his research and his colleagues in states where these products are already in use the THC/CBD based medications have as good or better side effect control from chemotherapies without causing side effects themselves.

d. Experience with patients with severe seizures or muscle spasms:

In cases of severe seizures which induce muscle spasm often the first line of therapy has failed so as a result multiple levels of anesthesia are invoked, in many cases as a lifesaving procedure, to control the seizure while other modalities are sought to help prevent future ones. Dr. Arcos having vast experience in the field of anesthesia understands this issue having been involved in many similar situations as associate professor at the University Of Florida Department Of Anesthesia where an area of specialty at the University is dedicated to patients with severe seizures from epilepsy and other seizure causing pathologies. He champions the search for more and better modalities to avert and control these severe life threatening problems.

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:

Research at the Harbor Side Health Center in San Jose, CA has shown that medical marijuana helps cancer patients in a significant way with anxiety and sleep related issues, improving a blunted appetite, decreasing nausea and vomiting and all associated generalized pain.

Improvements in neuropathic pain from Platinum based chemotherapy or Taxanes that caused peripheral neuropathy are also of great use. Studies out of Israel at the Ranbun Health Care Research Campus have shown patient suffering from anti-cancer treatments of all types causing symptoms such as nausea and vomiting, mood disorders, fatigue, weight loss, constipation, sleep disorders and most significantly pain related issues showed improvement.

The National Cancer Institute report in December 2014 states that CBD/THC based medication showed a better anti-emetic profile than did current FDA approved products. The same report also compared CBD/THC to morphine type medications and found the efficacy to be equal but with CBD/THC products having fewer side effects and they were more tolerable.

The American Academy of Pediatric has petitioned the DEA to reclassify Cannabis as a schedule II due to its use in severely ill children. This is due to independent studies that show benefits in its use in epilepsy and cancer patients.

A study out of the Center for Medical Cannabis Research at the University of California San Diego stated that current FDA approved medications do seem to have a slightly better performance profile on easing cancer treatment related issues but that the side effects associated with these make their use less attractive than CBD/THC based medications which have minimal side effects.

What is Cannabis? *Cannabis*, also known as marijuana, is a plant from Central Asia that is grown in many parts of the world today. The *Cannabis* plant produces a resin containing compounds called cannabinoids. Some cannabinoids are psychoactive (acting on the brain and changing mood or consciousness). In the United States, *Cannabis* is a controlled substance and has been classified as a Schedule I agent (a drug with increased potential for abuse and no known medical use).

By federal law, the use, sale, and possession of *Cannabis* (marijuana) is illegal in the United States. However, a growing number of states and the District of Columbia have enacted laws to legalize medical marijuana. (See Question 4).

What are cannabinoids? Cannabinoids are active chemicals in *Cannabis* that cause drug-like effects throughout the body, including the central nervous system and the immune system. They are also known as phytocannabinoids. The main active cannabinoid in *Cannabis* is delta-9-THC. Another active cannabinoid is cannabidiol (CBD), which may relieve pain and lower inflammation without causing the "high" of delta-9-THC.

Cannabinoids may be useful in treating the side effects of cancer and cancer treatment. Other possible effects of cannabinoids include:

Anti-inflammatory activity.

Blocking cell growth.

Preventing the growth of blood vessels that supply tumors.

Antiviral activity.

Relieving muscle spasms caused by multiple sclerosis.

What is the history of the medical use of Cannabis? The use of *Cannabis* for medicinal purposes dates back at least 3,000 years. It came into use in Western medicine in the 19th century and was said to relieve pain, inflammation, spasms, and convulsions.

In 1937, the U.S. Treasury began taxing *Cannabis* under the Marijuana Tax Act at one dollar per ounce for medicinal use and one hundred dollars per ounce for recreational use. The American Medical Association (AMA) opposed this regulation of *Cannabis* and did not want studies of its potential medicinal benefits to be limited. In 1942, *Cannabis* was removed from the U.S. Pharmacopoeia because of continuing concerns about its safety. In 1951, Congress passed the Boggs Act, which included *Cannabis* with narcotic drugs for the first time.

Under the Controlled Substances Act of 1970, marijuana was classified as a Schedule I drug. Other Schedule I drugs include heroin, LSD, mescaline, methaqualone, and gamma-hydroxybutyrate (GHB).

Although *Cannabis* was not believed to have any medicinal use, the U.S. government distributed it to patients on a case-by-case basis under the Compassionate Use Investigational New Drug (IND) program between 1978 and 1992.

In the past 20 years, researchers have studied how cannabinoids act on the brain and other parts of the body. Cannabinoid receptors (molecules that bind cannabinoids) have been discovered in brain cells and nerve cells in other parts of the body. The presence of cannabinoid receptors on immune system cells suggests that cannabinoids may have a role in immunity.

If *Cannabis* is illegal, how do some cancer patients in the United States use it? Though federal law prohibits the use of *Cannabis*, the table below lists the localities that allow its use for certain medical conditions.

List of Localities That Permit Use of *Cannabis* for Certain Medical Conditions

Alaska	Arizona	California	Colorado	Delaware	Dist.of Columbia
Hawaii	Illinois	Maine	Maryland	Massachusetts	Michigan
Minnesota	Montana	Nevada	New Hampshire		New Mexico
New York	Oregon	Rhode Island	Vermont		Washington

How is *Cannabis* administered? *Cannabis* may be taken by mouth or may be inhaled. When taken by mouth (in baked products or as an herbal tea), the main psychoactive ingredient in *Cannabis* (delta-9-THC) is processed by the liver, making an additional psychoactive chemical. When *Cannabis* is smoked and inhaled, cannabinoids quickly enter the bloodstream. The additional psychoactive chemical is produced in smaller amounts than when taken by mouth.

A growing number of clinical trials are studying a medicine made from a whole-plant extract of *Cannabis* that contains specific amounts of cannabinoids. This medicine is sprayed under the tongue.

Have any preclinical (laboratory or animal) studies been conducted using *Cannabis* or cannabinoids? Preclinical studies of cannabinoids have investigated the following activities:

Antitumor activity

Studies in mice and rats have shown that cannabinoids may inhibit tumor growth by causing cell death, blocking cell growth, and blocking the development of blood vessels needed by tumors to grow. Laboratory and animal studies have shown that cannabinoids may be able to kill cancer cells while protecting normal cells.

A study in mice showed that cannabinoids may protect against inflammation of the colon and may have potential in reducing the risk of colon cancer, and possibly in its treatment

A laboratory study of delta-9-THC in hepatocellular carcinoma (liver cancer) cells showed that it damaged or killed the cancer cells. The same study of delta-9-THC in mouse models of liver cancer showed that it had antitumor effects. Delta-9-THC has been shown to cause these effects by acting on molecules that may also be found in non-small cell lung cancer cells and breast cancer cells.

A laboratory study of cannabidiol (CBD) in estrogen receptor positive and estrogen receptor negative breast cancer cells showed that it caused cancer cell death while having little effect on normal breast cells. Studies in mouse models of metastatic breast cancer showed that cannabinoids may lessen the growth, number, and spread of tumors.

A laboratory study of cannabidiol (CBD) in human glioma cells showed that when given along with chemotherapy, CBD may make chemotherapy more effective and increase cancer cell death without harming normal cells. Studies in mouse models of cancer showed that CBD together with delta-9-THC may make chemotherapy such as temozolomide more effective.

Stimulating appetite

Many animal studies have shown that delta-9-THC and other cannabinoids stimulate appetite and can increase food intake.

Pain relief

Cannabinoid receptors (molecules that bind cannabinoids) have been studied in the brain, spinal cord, and nerve endings throughout the body to understand their roles in pain relief.

Cannabinoids have been studied for anti-inflammatory effects that may play a role in pain relief.

Have any clinical trials (research studies with people) of *Cannabis* or cannabinoid use by cancer patients been conducted?

No clinical trials of *Cannabis* as a treatment for cancer in humans have been found in the CAM on PubMed database maintained by the National Institutes of Health.

Cannabis and cannabinoids have been studied in clinical trials for ways to manage side effects of cancer and cancer therapies, including the following:

Nausea and vomiting

Delta-9-THC taken by mouth: Two cannabinoid drugs approved in the United States are available under the names dronabinol and nabilone. Both dronabinol and nabilone are approved by the Food and Drug Administration (FDA) for the treatment of chemotherapy-related nausea and vomiting in patients who have not responded to standard therapy. Many clinical trials have shown that both dronabinol and nabilone worked as well as or better than some of the weaker FDA-approved drugs to relieve nausea and vomiting. Newer drugs given for chemotherapy-related nausea have not been directly compared with *Cannabis* or cannabinoids in cancer patients.

Inhaled *Cannabis*: Three small trials have studied inhaled *Cannabis* for the treatment of chemotherapy-related nausea and vomiting. Various study methods and chemotherapy agents were used with mixed results. There is not enough information to interpret these findings.

Stimulating appetite

Delta-9-THC taken by mouth: A clinical trial compared delta-9-THC (dronabinol) and a standard drug (megestrol) in patients with advanced cancer and loss of appetite. Results showed that delta-9-THC was not as effective in increasing appetite or weight gain in advanced cancer patients compared with standard therapy. However, a clinical trial of patients with HIV /AIDS and weight loss found that those who took delta-9-THC had increased appetite and stopped losing weight compared with patients who took a placebo.

Inhaled *Cannabis*: There are no published studies of the effect of inhaled *Cannabis* on cancer patients with loss of appetite. Studies of healthy people who inhaled *Cannabis* showed that they consumed more calories, especially high-fat and sweet snacks.

Pain relief

Combining cannabinoids with opioids: In a small study of 21 patients with chronic pain, combining vaporized *Cannabis* with morphine relieved pain better than morphine alone, while combining vaporized *Cannabis* with oxycodone did not produce significantly greater pain relief. These findings should be tested in further studies.

Delta-9-THC taken by mouth: Two small clinical trials of oral delta-9-THC showed that it relieved cancer pain. In the first study, patients had good pain relief as well as relief of nausea and vomiting and better appetite. A second study showed that delta-9-THC could be given in doses that gave pain relief comparable to codeine. An observational study of nabilone also showed that it relieved cancer pain along with nausea, anxiety, and distress when compared with no treatment. Neither dronabinol nor nabilone is approved by the FDA for pain management.

Whole *Cannabis* plant extract medicine: A study of a whole-plant extract of *Cannabis* that contained specific amounts of cannabinoids, which was sprayed under the tongue, found it was effective in patients with advanced cancer whose pain was not relieved by strong opioids alone. Patients who received the lower doses of cannabinoid spray showed markedly better pain control and less sleep loss compared with patients who received a placebo. Results showed that, for some patients, control of their cancer-related pain continued without needing higher doses of spray or higher doses of their other pain medicines.

Anxiety and sleep

Inhaled *Cannabis*: A small case series found that patients who inhaled marijuana had improved mood, improved sense of well-being, and less anxiety.

Whole *Cannabis* plant extract spray: A trial of a whole-plant extract of *Cannabis* that contained specific amounts of cannabinoids, which was sprayed under the tongue, found that patients had improved sleep quality.

Have any side effects or risks been reported from *Cannabis* and cannabinoids?

Adverse side effects of cannabinoids may include:

- Rapid beating of the heart.
- Low blood pressure.
- Muscle relaxation.
- Bloodshot eyes.
- Slowed digestion and movement of food by the stomach and intestines.
- Dizziness.
- Depression.
- Hallucinations.
- Paranoia.

Because *Cannabis* smoke contains many of the same substances as tobacco smoke, there are concerns about how inhaled cannabis affects the lungs. A study of over 5,000 men and women without cancer over a period of 20 years found that smoking tobacco was linked with some loss of lung function but that occasional and low use of cannabis was not linked with loss of lung function.

Because use of *Cannabis* over a long time may have harmful effects on the endocrine and reproductive systems, rates of testicular germ cell tumors (TGCTs) in *Cannabis* users have been studied. Larger studies that follow patients over time and laboratory studies of cannabinoid receptors in TGCTs are needed to find if there is a link between *Cannabis* use and a higher risk of TGCTs.

Both *Cannabis* and cannabinoids may be addictive.

Symptoms of withdrawal from cannabinoids may include:

- Irritability.
- Trouble sleeping.
- Restlessness.
- Hot flashes.
- Nausea and cramping (rarely occur).

These symptoms are mild compared to withdrawal from opiates and usually lessen after a few days.

Are *Cannabis* or cannabinoids approved by the U.S. Food and Drug Administration for use as a cancer treatment in the United States?

The U.S. Food and Drug Administration has not approved *Cannabis* or cannabinoids for use as a cancer treatment.

Are *Cannabis* or cannabinoids approved by the U.S. Food and Drug Administration for use as a treatment for cancer-related symptoms or side effects of cancer therapy?

Cannabis is not approved by the U.S. Food and Drug Administration (FDA) for the treatment of any cancer-related symptom or side effect of cancer therapy.

Two cannabinoids (dronabinol and nabilone) are approved by the FDA for the treatment of chemotherapy-related nausea and vomiting in patients who have not responded to standard therapy.

Epilepsy Foundation Calls for Increased Medical Marijuana Access and Research

Thursday, March 20, 2014

*By Philip M. Gattone, President & CEO, Epilepsy Foundation, and
Warren Lammert, Chair, Epilepsy Foundation Board of Directors*

*With Commentary from Orrin Devinsky, M.D., Professor of Neurology, Neurosurgery and
Psychiatry, Director, NYU Comprehensive Epilepsy Center Member of Epilepsy Foundation
National Board of Directors*

As parents and as advocates, we feel an urgency to respond and take action on an issue that has been brought to the Epilepsy Foundation from individuals we serve across the country-- the use of marijuana to treat epilepsy. We write this with advice and support from Nathan Fountain, Chairman of our Professional Advisory Board, and with advice and support from a range of other leading epilepsy professionals and board members.

2.3 million Americans live with epilepsy, a neurological condition that includes recurring seizures. More than 1 million of them live with uncontrolled seizures. Some of these people may be helped by surgery or other non-drug treatments, but for many, no answers have been found yet. People with uncontrolled seizures live with the continual risk of serious injuries and loss of life.

The Epilepsy Foundation supports the rights of patients and families living with seizures and epilepsy to access physician directed care, including medical marijuana.

Nothing should stand in the way of patients gaining access to potentially life-saving treatment. If a patient and their healthcare professionals feel that the potential benefits of medical marijuana for uncontrolled epilepsy outweigh the risks, then families need to have that legal option now -- not in five years or ten years. For people living with severe uncontrolled epilepsy, time is not on their side. This is a very important, difficult, and personal decision that should be made by a patient and family working with their healthcare team.

Treatments for epilepsy with any form of marijuana come with risks, as there is much that is not known about its effects. The consistency of available formulations also needs to be addressed. Caution is appropriate, and we strongly recommend that patients with uncontrolled seizures seek out an epilepsy specialist. However, existing therapies have real side-effects both known and unknown, and, just as there are risks with any treatment; every day without seizure control is a risk to life. Every seizure is a possible opportunity lost to live, learn, and grow.

The Epilepsy Foundation calls for an end to Drug Enforcement Administration (DEA) restrictions that limit clinical trials and research into medical marijuana for epilepsy.

We applaud recent decisions that have allowed clinical trials of Cannabidiol (CBD) oil, to begin in several states. Certain components of medical marijuana, including CBD, have shown effectiveness in animal studies, and there have been encouraging anecdotal reports from patients. But further research and unbiased clinical trials are needed to establish whether and in what forms medical marijuana is or is not effective and safe. Restrictions on the use of medical marijuana continue to stand in the way of this research.

The Epilepsy Foundation believes that an end to seizures should not be determined by one's zip code.

Our current situation as an epilepsy community is not acceptable. Families looking to access medical marijuana as a treatment are facing terrible decisions. One parent may move across the country to live with a child to seek this treatment. Other families may uproot entirely, including leaving their job, to move where they can access CBD oil. In the past, when therapies not yet approved by the Food and Drug Administration (FDA) were available abroad and left only to those who could afford to travel, we fought for compassionate access. We are here to continue the fight.

The Epilepsy Foundation will be doing the following to support improved access and research into medical marijuana:

Calling on the Drug Enforcement Administration to implement a lesser schedule for marijuana so that it can be more easily accessible for medical research.

Supporting appropriate changes to state laws to increase access to medical marijuana as a treatment option for epilepsy; including pediatric use as supported by a treating physician.

Supporting the inclusion of epilepsy as a condition that uses medical marijuana as a treatment option where it is currently available.

Supporting research on multiple forms of cannabis and seizures.

What can you do to help? Advocate for increased access and for the freedom to conduct medical research on a potentially effective treatment against seizures and epilepsy. Join with us at <http://capwiz.com/efa/mlm/signup>.

Here's Our Story:

As the President & CEO and as the Chair of the Board of the Epilepsy Foundation, we are privileged to lead a nationwide network of caring volunteers and staff who work tirelessly to improve lives of individuals living with epilepsy.

We are also fathers of individuals living with epilepsy. Phil's son has had thousands of seizures in his life and has endured two brain surgeries to stop his seizures. Warren's daughter has a genetic form of epilepsy that is marked by severe seizures and, despite an implanted medical device and three different epilepsy medicines, endures daily waves of seizures.

Some individuals, specifically families of children with uncontrolled seizures, are using what is called cannabidiol oil, or CBD oil, and anecdotally a few are seeing remarkable results. This is

truly spectacular -- anytime someone finds a treatment that stops seizures, there is cause for celebration because seizure freedom for one person means hope of seizure freedom for others.

There is still a lot we don't know about the medical use of marijuana for epilepsy. Until clinical trials are completed, doctors and patients will not know whether medical marijuana or CBD will on balance harm someone or help someone with epilepsy. We are advocating for the rights of patients and families to determine with their doctor if this is an appropriate therapy for them, but we recognize the unknowns and the difficulty of this decision for an individual patient.

The Epilepsy Foundation is proud that we are currently funding an important research study to learn more about the effect of a form of cannabis on individuals living with uncontrolled epilepsy.

As fathers, we know the pain of watching our children experience uncontrolled seizures.

We know how epilepsy impacts development in children for whom no available current treatment has been successful.

We know about the dangers that can occur when families are forced to leave medical systems and physicians they know to move to other states.

We know seizures not only affect the individual enduring seizures, it also impacts siblings, parents, grandparents, kids and grandchildren, other loved ones and friends.

We know the difference between having recurring seizures and not having seizures can mean the difference between life and death.

Warren's daughter is fortunate to be enrolled in a clinical trial of CBD. We do not know if this will help Sylvie but know the cost of her unrelenting seizures. Weighing the issue with her doctor, we decided the potential benefits outweigh the risks. Other parents and other individuals living with potentially devastating seizures should have the same opportunity to make that determination.

If an epilepsy patient and their doctor feel that marijuana is their best treatment option then they need to have safe, legal access to medical marijuana and they need that access now.

Medical Marijuana: We Need Proof and Compassion

Orrin Devinsky, M.D., Professor of Neurology, Neurosurgery and Psychiatry, Director, NYU Comprehensive Epilepsy Center

Member of Epilepsy Foundation National Board of Directors

There is an enormous unmet need for better treatments for children and adults with epilepsy. Approximately one-third of people with epilepsy continue to suffer from seizures despite the best medical, dietary, and surgical therapies. For those with treatment-resistant epilepsy, the enormous toll includes the direct and potentially deadly consequences of the seizures, which are

compounded by the disabling physical, cognitive and behavioral side effects from high doses of multiple antiepileptic drugs. Despite advances in epilepsy therapy over the past decades, our progress remains painfully slow and disappointing. Medical care and research fails many patients. The statement by Phil Gattone and Warren Lammert of the Epilepsy Foundation strongly advocates that there should be legal access for all epilepsy patients and their doctors who feel that marijuana is their best treatment option. I agree.

In a recent Op-Ed piece in the New York Times, my colleague Daniel Friedman and I emphasized 1) the need for randomized controlled trials, considered the gold standard for clinical trials, to better understand the safety and effectiveness of any drug or combination of drugs – whether derived from a marijuana plant or synthesized in a lab, 2) the need for changes in how the Drug Enforcement Agency classifies marijuana and its constituents as Schedule 1 drugs. This is much too restrictive based on the scientific data, especially for cannabidiol (CBD) – the major non-psychoactive component of marijuana, and 3) while we await scientific studies, that marijuana products be made available to pediatric and adult patients with treatment-resistant epilepsy.

Charlotte Figi, who has brought this story to the forefront, suffers from Dravet Syndrome, a genetic disorder that often causes severe epilepsy. Medical marijuana, high in CBD and low in THC, has been reported to cause a dramatic reduction in her seizures and eliminate her need for seizure medications. Caring for epilepsy patients for 25 years, I have seen firsthand the devastation that uncontrolled epilepsy can bring. In the last 2 years, two of my patients with Dravet Syndrome died from sudden unexpected death in epilepsy (SUDEP).

Data from animal studies showing CBD and THC can stop seizures, stories like Charlotte's, and the tremendous unmet need led me to organize the first international symposium on cannabidiol for epilepsy at NYU in October 2013, to provide testimony for compassionate use for marijuana to several state legislatures, and to work as a researcher (without consulting fees or salary support) to assess CBD as an epilepsy therapy. For our initial study for 25 pediatric and young adult patients, we have received inquiries from more than 500 families and patients.

We stand at an unusual inflection point where families are demanding access to a medication that may or may not be beneficial, and for which the side effects may be less than many medications prescribed by doctors; the medical community lacks convincing efficacy or safety data for children with epilepsy; and the Drug Enforcement Agency's overly conservative scheduling of marijuana hampers research and access. Yet there should be caution for both expectations and potential side effects. Humility is essential in trying to understand something for which we lack solid evidence. Both doctors and patients are equally biased and the greater the expectation, the greater the potential for bias. We urgently need data from randomized controlled trials where the biases of companies, doctors, patients, and parents are meticulously removed.

We need to make a balanced decision about compassionate use. If I were Charlotte Figi's parents and lived in Colorado I would have done exactly what they did. And as a doctor, I would gladly prescribe marijuana products for many of my patients who failed existing therapies if it were legal in my state. Trying marijuana or related compounds should be regarded like any other experimental treatment – a shared decision between patient/parent and doctor, that takes into

account the severity of disease, risk and benefits of treatment, and existence of alternate treatment options, all guided by the principle of "first do no harm". Until we have the scientific data, we should make medical marijuana available to physicians who care for people with treatment-resistant epilepsy and their patients.

Epilepsy Foundation of Colorado

Cannabidiol (CBD) as a Medication for Children with Epilepsy

March 2014

The use of marijuana for children with epilepsy has been in the national spotlight since CNN's Sanjay Gupta featured in August 2013 the story of Charlotte Figi, a Colorado child with Dravet Syndrome. Charlotte's seizures declined dramatically after she began taking a medication called "Charlotte's Web" made from marijuana plants. The medication differs from standard marijuana in that it has high levels of cannabidiol (CBD), the component believed to be effective in controlling seizure activity, and very low levels of THC, the psychoactive component that makes marijuana users high.

Colorado has been at the epicenter of this development because the Stanley brothers, the producers of this medication, are located here. In fact, families from around the United States have moved to Colorado in order to access Charlotte's Web for their children, since federal law prohibits transporting marijuana across state lines, even to other states that permit use of marijuana for medical purposes.

Many of the issues surrounding use of CBD by children with epilepsy have received extensive coverage from major media sources ([click here](#) for links to relevant articles). This summary provides information about the medications and their use, the status of related research, and resources for families, medical professionals, and others contemplating treatment decisions. It also suggests regulatory changes that could encourage needed medical research and expand treatment options for patients with severe forms of epilepsy.

Key Points

The medications being taken by children with epilepsy are far different from the marijuana widely used for recreational purposes.

These medications are taken in liquid form, not smoked.

These medications are high in cannabidiol (CBD), a component in marijuana that has appeared to be successful in reducing seizures in some animal studies, and very low in THC, the psychoactive component of marijuana (that is, the substance that makes users "high").

Two medications containing CBD are being used to treat children with severe epilepsy; currently one has a waiting list (Charlotte's Web, also known as "Realm Oil") and the other is not available in Colorado (Epidiolex).

Charlotte's Web, extracted from marijuana plants by the Stanley brothers and dispensed in Colorado Springs, can be used legally in Colorado.

As of late February 2014, according to the Stanleys' Realm of Caring Foundation, 187 pediatric and 27 adult patients with epilepsy are taking Charlotte's Web. There is an extensive waiting list. As of December 2013, a licensee of the Stanley brothers is providing Charlotte's Web in California.

Epidiolex, a medication containing CBD and developed by the British company GW Pharmaceuticals, has received Investigational New Drug (IND) approval by the Food and Drug Administration and is available only by physician application to the FDA. Currently about 10 physicians in the United States have been approved to treat patients using Epidiolex; none of them are in Colorado

Early results are promising, but more research is needed (and it is happening).

The Realm of Caring Foundation reports that, among the initial cohort of 27 children with epilepsy who received Charlotte's Web, 23 (85%) experienced a reduction of 50% or more in seizure frequency. Margaret Gedde, MD, who has seen in her clinical practice many of the children taking Charlotte's Web, estimates that overall one-quarter of children with epilepsy have had dramatic improvement after taking Charlotte's Web and about another 50 percent have had some improvement.

Doctors in Colorado and researchers at Stanford University have collected summaries of patient histories suggesting positive impact of CBD in children with epilepsy.

However, these reports are anecdotal; no rigorous clinical trials of either medication have been completed yet.

GW Pharmaceuticals is completing design arrangements with the FDA for clinical trials of Epidiolex and expects to initiate these studies in 2014.

The Stanleys are pursuing efforts to develop a clinical trial of Charlotte's Web using a study design similar to that of the Epidiolex studies.

In the meantime, medications containing CBD should be available to children with severe epilepsy, but should be considered a last resort until further research is completed.

Administration of Charlotte's Web and Epidiolex to children who have epilepsy has been limited to severe, intractable cases where other established medication regimens have proved unsuccessful. These children and their families have had few if any treatment options left.

Until clinical trials provide more information about the efficacy of these medications, they should not be prescribed unless other medications with more established track records have been tried without success.

The possible long-term effects of CBD use by young children are unknown.

Parents and professionals contemplating the use of CBD for children with epilepsy should be cautious in arriving at informed treatment decisions.

The FDA plays no role in ensuring the quality and consistency of medical marijuana products, and marijuana dispensaries in Colorado are not required to submit their products to any independent testing.

The Stanleys have submitted Charlotte's Web for third-party testing in an attempt to ensure that the medication has consistent chemical content. This testing is not legally required. In late 2013 the Stanleys hired an in-house chemist with pharmaceutical industry experience to conduct testing; they indicate that they continue to send about one-fifth of their samples for third-party verification.

Other dispensaries or growers in Colorado may claim to offer products that are high in CBD and/or low in THC. Given the lack of regulatory oversight or testing requirements, the only reliable way to verify the CBD or THC content of these medications (if it has not been verified already) is to have the product independently tested by a qualified laboratory.

There have been reports of psychoactive reactions in children with severe epilepsy who took cannabis obtained from other sources as an experimental treatment.

Due to the newness of these medications, little is known about how they operate in the body or about possible interactions with other medications that patients may also be taking.

The unusual legal status of medical marijuana in the United States today presents additional complications. For example, medications containing CBD cannot legally be transported across state lines or administered by school nurses.

Charlotte's Web and Epidiolex are not covered by health insurance.

The cost of Charlotte's Web ranges from \$100 to \$600 per month, depending on dosage level and patient weight. Some families with financial need receive discounts through the Stanleys' dispensary.

GW Pharmaceuticals is currently providing Epidiolex at no cost for patients in INDs and forthcoming clinical trials. If the FDA approves Epidiolex for medical use following clinical trials, it could then become eligible for insurance coverage.

Government actions could improve the current situation regarding medications containing CBD, with regard to both treatment and research.

We support the proposal by Colorado state health director Larry Wolk, MD, MSPH to earmark funds for research on the medical impact of marijuana-related treatments.

Marijuana is currently classified as a Schedule I substance, with no medicinal value, on the federal schedules of controlled substances. A change in this classification could make it easier to conduct research on CBD-based medications, or for physicians to obtain and prescribe them. We join the national Epilepsy Foundation in calling on the Drug Enforcement Administration to

implement a lesser schedule for medications containing CBD so that they can be more accessible for medical research.

The federal government should provide assurance to healthcare organizations that their eligibility for federal funding will not be endangered if members of their organizations participate in research on medical marijuana.

Federal and state governments should consider permitting children with severe illnesses to carry legitimate medications containing CBD across state lines.

Expanded regulatory activity may be warranted to protect against the marketing of “high-CBD” medications for children that could also be high in THC or pose other risks.

Drugs and Supplements **Marijuana (*Cannabis sativa*)**

Evidence

These uses have been tested in humans or animals. Safety and effectiveness have not always been proven. Some of these conditions are potentially serious, and should be evaluated by a qualified healthcare provider.

Chronic pain

Marijuana has been studied for the treatment of chronic pain. It has been used in people whose pain did not respond to other drugs such as narcotics. Cannabis-based products like Sativex® are used to treat different types of pain, such as pain from cancer or multiple sclerosis. It is approved in Canada and many parts of Europe. In the United States, it is being studied in people who have cancer-related pain. Other cannabis-based products, such as the U.S. Food and Drug Administration (FDA)-approved dronabinol (Marinol®), are also being studied.

Multiple sclerosis

Marijuana has been studied for the relief of multiple sclerosis symptoms, such as nerve pain, muscle spasms, and urinary disorders. The active ingredients have effects on the central nervous system and immune cells.

f. Knowledge of good manufacturing practices;

As set forth in the United States by the FDA, we have embraced the guidelines for the growing, cultivating, processing and packaging of pharmaceuticals that are used as a template of the industry. Since there are no specific guidelines published by the FDA this is the best approach using general protocols when no specific ones to this product exist. Having applied the same

approach but for specific areas of the medical director's practice in the past he is familiar with on how to follow the examples set forth by the FDA and other state and local authorities.

Good manufacturing practices will be applied to all aspects of the manufacturing of our medical marijuana. In the grow phase we will focus on the cultivation and processing for botanicals destined for medical use as set forth in guidelines for growing, harvesting similar plants. The processing portion where the THC/CBD is extracted out the FDA guidelines for extracting botanical based medicines for pharmaceutical use will be followed. From this point where we have a sterile liquid that requires packing the guidelines for food grade and pharmaceutical grade packaging will be strictly adhered to. Lastly as for the labeling, current state and federal guidelines will be adhered to with special interest on lot numbers and tracking numbers by bar code which will facilitate quality control and avoid diversion

g. Knowledge of analytical and organic chemistry:

North Florida Group's Medical Director has received a Dual Degree in Biology/Chemistry

NFG's Medical Directors past experience includes:

Operating as an analytical chemist with Olin Chemical Company as a Quality Control Officer with responsibilities to include control and tracking of all possible pollutants from the manufacturing facility. Quality Control Officer for the subsidiary division under NASA (National Aeronautic Space Administration) overseeing the production of retro rocket fuel for space shuttles and the break down and elimination of the waste products from the production of this fuel.

Similar position held with DeGussa Chemical Company as a Quality Control Officer with responsibilities inspecting chlorine production and shipments.

University Award in Chemistry awarded as a graduating senior at University of Mobile.

Graduating with a dual degree in both Chemistry and Biology.

h. Knowledge of analytical laboratory methods:

In reference to the above (g) extensive laboratory work and use invoked to all samples being analyzed via dilution and molar concentration determination.

Currently supervising two medical offices with CLIA approved labs certified under the laboratory licensing unit of State of Florida for Health Care Administration. Laboratory tests focus on ABO, RH, Endocrinology, Hematology and Micrology.

Dr. Duncan, prior to entering medical school worked as an Analytical Chemist at both Olin Chemical Company and DeGussa Chemical Company. Using laboratory techniques during his tenure which are similar to what will be needed in the production of a cannabis based oil. His knowledge in this area will prove valuable in his oversight of the facility.

1. Knowledge of analytical laboratory quality control, including maintaining a chain of custody:

Our Medical Director has worked closely with local and state law enforcement over the years in cases of rape, incest and other crimes against patients in his Obstetrical and gynecology practice. He has hands on experience in chain of custody procedures having testified as an expert witness multiple cases in which chain of custody was required to insure prosecution. A major part in the chain of custody procedures is proper documentation and minimizing/eliminating any chance of contamination. Nowhere is this more important than in criminal prosecution so to transition to cannabis production will be easily done.

In the case of Medical Marijuana this experience is invaluable to insure avoiding diversion of medications. Tracking and batch sampling is key. Tracking and sampling will allow quick removal of any defective product prior to distributing to the patient. This system is part of "Good Manufacturing Practices" as spelled out in the WHO's recent updated schedule. Our company has partnered with an independent laboratory approved

1. Knowledge of and experience with, CBD/low-THC extraction techniques:

Experts have been consulted and employed by our company with specific knowledge of THC/CBD extraction techniques (as noted in the appropriate section) and it is under their guidance and in conjunction with our own expertise we will work as a single unit to produce product that meets and exceeds statutory guidelines.

Dr. Duncan's experience as an analytical chemist and working in nationally and internationally recognized laboratories where extraction techniques were used gives him unique perspective on the extraction process used in the cannabis industry.

The entire extraction process will be closely monitored and supervised by the Medical Director and Deputy Directors to insure proper best laboratory practices. Invoking the above strategies and using the industry tested quality control techniques currently followed by seventeen other states we will produce the purest grade of product possible.

1. Knowledge of CBD/low-THC routes of administration:

The current State of Florida approved route of administration is oral. The statues state it must be in an oil form thus giving a more stable product with an extended shelf life and minimal chance of bacterial or fungi growth.

An oil base will allow for a variety of forms to be utilized. We plan on three basic types initially.
High CBD Tincture
High CBD Capsule
High CBD Cartridge for metered dose vaporizing

These forms will allow for a variety of patients to be served taking into account preferences, limitations and restrictions. By this we mean that patients with oral cancer may have difficulty with capsules so a tincture will be preferred. This form will serve well in the pediatric population as well. Some patients who have asthma may not tolerate vaporizing but do fine with capsule or tincture. Then there are those who enjoy vaping and don't like more pills to take who will gravitate to the metered dose vaping system we offer. Administration orally in an oil form will allow a viable route for all patients from infants to aged adults. It can be applied to the gums of a patient, used in food products and/or taken in pure oil form.

In our production process and background we have the ability to enhance and expand to other forms as the need and as regulations call for it.

1. Experience in or knowledge of clinical trials or observational studies;

observational studies

Definition:

n.pl an investigational method involving description of the associations between interventions and outcomes. Outcomes research and practice audits are examples of this investigational method. For instance, during a practice audit, the outcomes produced by a sampling of patients who received a specific form of treatment may be monitored. An assessment is performed before and after a regimen of therapy is administered to compare and measure the effects.

As part of the medical director's preparation for becoming the director of a dispensary of medical marijuana he has for the past two years familiarized himself with every recent clinical trial and research paper published that are relevant to this topic including but not limited to studies referenced below.

His experience with observational studies dates back to his residency where as a part of the expanding research into HIV/AIDS he followed pregnant women throughout their pregnancy and delivery to monitor and determine which drug cocktails were the most appropriate for decreasing the risk of transmission to the baby.

Also in this same population but in a separate sub-group he followed routes of delivery and delivery techniques to determine the most effective at reducing the chance of sero-conversion of the baby.

The following is a only a sample of the extensive clinical trials Dr. Duncan has read and familiarized himself with in regards to cannabis used for medical purposes

The case for medical marijuana in epilepsy

Edward Maa^{1,2,*} and Paige Figi³

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Summary

Charlotte, a little girl with *SCN1A*-confirmed Dravet syndrome, was recently featured in a special that aired on CNN. Through exhaustive personal research and assistance from a Colorado-based medical marijuana group (Realm of Caring), Charlotte's mother started adjunctive therapy with a high concentration cannabidiol/ Δ^9 -tetrahydrocannabinol (CBD:THC) strain of cannabis, now known as Charlotte's Web. This extract, slowly titrated over weeks and given in conjunction with her existing antiepileptic drug regimen, reduced Charlotte's seizure frequency from nearly 50 convulsive seizures per day to now 2–3 nocturnal convulsions per month. This effect has persisted for the last 20 months, and Charlotte has been successfully weaned from her other antiepileptic drugs. We briefly review some of the history, preclinical and clinical data, and controversies surrounding the use of medical marijuana for the treatment of epilepsy, and make a case that the desire to isolate and treat with pharmaceutical grade compounds from cannabis (specifically CBD) may be inferior to therapy with whole plant extracts. Much more needs to be learned about the mechanisms of antiepileptic activity of the phytocannabinoids and other constituents of *Cannabis sativa*.

Case Report: Charlotte Figi

Charlotte's first seizure was prolonged status epilepticus at 3 months of age. She had frequent bouts of febrile and afebrile status epilepticus as well as tonic, tonic-clonic, and myoclonic seizures. She quickly transitioned care to a Level 4 Epilepsy Center, and her epileptologist confirmed an *SCN1A* gene mutation, and diagnosed her with Dravet syndrome (DNA Variant I: transition C>T; Nucleotide position: 2791; Codon 931; Amino Acid Change: Arginine > Cysteine; Variant Type: disease associated mutation (heterozygous)/Athena Diagnostics, 2009). She began losing milestones, and by 5 years of age her family was told that she “had reached the end of the road,” failing many medications (levetiracetam, oxcarbazepine, topiramate, zonisamide, valproate, clobazam, clonazepam, and valium) and the ketogenic diet. Charlotte had significant cognitive and motor delays, required a feeding tube for nutrition and water, struggled to walk and talk, and was full assist with her activities of daily living. At this point “Charlie” was experiencing up to 50 generalized tonic-clonic seizures per day.

Unfortunately, most people in the marijuana industry as well as physicians initially discouraged me from pursuing cannabis therapy, feeling that Charlotte was too much of a liability because she would be the youngest medical marijuana patient in the state at 5 years old. Eventually, I found Joel Stanley, who along with his brother had dedicated themselves to breeding a rare, high CBD strain of cannabis. After getting the green light from our team of epileptologists, pediatricians, and the reluctant state of Colorado, I started Charlotte at low doses of a sublingual preparation of the plant extract. I treated as I would with any antiepileptic drug, starting low and slowly increasing the extract dose, keeping the THC content sufficiently low to avoid psychotropic effects. For the first time since her seizures started, Charlotte experienced seven consecutive days without a single seizure! With a baseline frequency of 300+ convulsions (generalized tonic-clonic [GTC]) per week, by month three of high concentration CBD extract, Charlotte had a >90% reduction in GTC seizures, and had been weaned from her other antiepileptic drugs. Now at 20 months after starting what the Stanley Brothers would eventually dub “Charlotte's Web” (CW), Charlotte has only 2–3 nocturnal GTC seizures per month, is feeding and drinking orally and on her own, sleeps soundly through the night, and her autistic behaviors (self-injury, aggressiveness, self-stimulating behavior, poor eye contact, and poor social interaction) have improved. She has had only one episode of autonomic dysfunction

associated with Dravet syndrome in the same time period. She is finally walking and talking again.

At first it was too good to be true, but her control was so much better that we began to wean her clobazam, which was the only medication she was taking at the time we started Charlotte's Web. By the end of the first month, she was entirely off clobazam and had only had 3 GTC seizures. Several months later we still could not believe that CW was working so well and started to slowly back down on the dose. When we reached 2 mg of CBD/lb per day (from her steady dose of 4 mg CBD/lb per day), Charlotte's seizures started coming back and when she was completely off the CW, her seizures returned to 5–10 GTC seizures per day for 3 days, at which time we restarted CW. To see if the seizures would recur without CW, we have done this two other times and have had the same results each time.

Based on Charlotte's success, the Stanley Brothers created a nonprofit organization to address the needs of other patients with catastrophic epilepsy syndromes by helping them gain access to consistent, high quality, lab-tested, high-CBD-content cannabis. They will have treated >200 patients by early 2014. Families are moving from across the country and internationally to Colorado for treatment with CW.

Controlling Convulsions with Cannabis

Cannabis sativa has a long history of medicinal use, with the earliest documentation around 4000 B.C. in China, for the treatment of rheumatism, pain, and convulsions. In fact, cannabis was available over-the-counter in U.S. pharmacies for a variety of maladies until 1941, following passage of the Marijuana Tax Act of 1937, which limited its access. Finally, the Controlled Substances Act of 1970 classified cannabis as Schedule I, making its use illegal. Although the political environment surrounding “pot” hindered prospective human clinical investigation, researchers continued to elucidate the structure and activity of *C. sativa*. Mechoulam et al.[1] determined the structure of Δ^9 -tetrahydrocannabinol (THC) and cannabidiol (CBD) in 1963. A few case reports suggested anticonvulsant activity of Δ^9 -THC, but psychotropic side effects were often rate limiting.[2, 3] A conflicting report suggested that the smoking of marijuana may be proconvulsant.[4] In 1973, Carlini[5] first demonstrated the anticonvulsant effects of CBD, its absence of any clear toxicity, and its lack of psychotropic effects. In 1975, Juhn Wada protected cats[6] from kindled seizures with Δ^9 -THC, and prevented seizures in already kindled baboons.[7] In 1980, Cunha et al.[8] performed a randomized, double-blind, placebo controlled trial of 15 patients who received either CBD or placebo, in addition to their existing medication. Four of the eight patients “remained almost free” of convulsions; three additional patients demonstrated “partial improvement,” and one of eight had no effect at all. In contrast only one of the placebo patients showed improvement.

Part of the challenge of understanding why cannabis has apparently contradictory effects in epilepsy likely has to do with the complexity of the plant itself. *Cannabis sativa* has 489 known constituents,[9] only 70 of which are cannabinoids, with the remainder including potentially neuroactive substances such as terpenes, hydrocarbons, ketones, aldehydes, and other small hydrophobic compounds capable of crossing the blood–brain barrier. The variability of the strain-specific ratios of the most common cannabinoid, Δ^9 -THC, and the second most common

cannabinoid, CBD_x, offers further complexity in utilizing whole cannabis as an antiepileptic. In addition, the mode of administration likely affects bioavailability and neuroactivity. For instance, smoked and vaporized cannabis requires heat, which may alter the putative antiepileptic substance(s), whereas ingested cannabis must survive the acidic environment of the stomach and first pass metabolism. The extraction method is also critical, as the conditions and solvents used to separate these phytochemicals may alter them in the process.

The attractiveness of isolating a single compound that is responsible for a specific desired attribute is not lost on physicians, patients, parents, growers, and scientists, but it is as likely that a combination of neuroactive substances taken together rather than a single substance is responsible for any potential antiepileptic effect. For instance, the endocannabinoid system was discovered when the endogenous receptor for Δ^9 -THC was identified in 1990.^[10] The seven transmembrane G protein-coupled receptor called cannabinoid receptor type 1 (CB₁) mediates neuronal inhibition by promoting decreased calcium influx and increased potassium efflux. In 1992, the endogenous ligands to CB₁ were identified: "anandamide," an arachidonic acid derivative, and 2-arachidonoyl glycerol (2-AG), a phosphatidyl inositol precursor. These endocannabinoids are produced on demand during excessive neuronal excitation and are felt to be part of a natural dampening feedback loop. However, they have been found on both γ -aminobutyric acid (GABA)ergic as well as glutamatergic neurons, so their net effect is not entirely predictable. Although this may offer one possible mechanism by which cannabis controls seizures (or exacerbates them), cannabidiol does not bind to CB₁, and at this time its molecular target is not completely understood. CBD may be an agonist of 5-HT_{1a} receptor, with similar affinity as serotonin,^[11] or an agonist of a novel endocannabinoid receptor GPR55.^[12] It is possible that CBD and Δ^9 -THC work synergistically to suppress seizures. In fact Ethan Russo, senior medical advisor to GW Pharma, recently reviewed the evidence for the "entourage effect" of the phytocannabinoids and terpenoids,^[13] and he makes a strong case for their synergistic effects in a variety of disease states.

Based on conversations with the parents who are currently pursuing Charlotte's Web, the most compelling arguments for the need to study whole cannabis therapy are the concept of autonomy and availability. A naturally occurring and potentially effective herbaceutical is very attractive to these families. Apart from the daily challenges and emotional toll of caring for children with a high frequency of convulsions and/or drop attacks, the risk of sudden unexplained death in epilepsy (SUDEP) looms over these caretakers. The present availability of a potentially useful therapy is driving a flurry of families to uproot and relocate to Colorado. Although the excitement surrounding Epidiolex (GW Pharma's pharmaceutical grade CBD plant extract) is high among these families, their access to the clinical trial sites seem even more remote than trying their luck in Colorado, and many are not willing to wait the countless years of pharmaceutical approval anticipated for Epidiolex, as their children's SUDEP risk continues to accumulate. The obvious and very serious problem is that patients and families may mistake what available science there is behind cannabis research and attempt to extract whole plant compounds on their own. Anecdotal accounts have surfaced locally since the story of Charlotte aired on CNN of severe pediatric intoxications resulting from stove-top extractions with butter. Other reports reveal that in the haste of moving, proper transition planning is ignored and many of these children are ending up in the intensive care unit in status epilepticus after their cross-country move. Also new since the airing of Charlotte's story, Colorado dispensaries are touting their own versions of "high CBD content" tinctures, ingestibles, and capsules. With little to no

ability to keep up with the regulatory demands of the medical/recreational cannabis industry, quality control of available cannabis products is next to impossible at this time, but critically needed.

Despite all of the challenges of medical marijuana as a potential therapy for epilepsy, what is not controversial is the need for a call for calm, and at the same time a call for thoughtful and thorough pharmacologic and clinical investigation into cannabis and its many constituent compounds to confirm or disprove its safety and antiepileptic potential. Growers and regulators must satisfy concerns about consistency, quality, and safety before medical cannabis will ever gain legitimacy as a mainstream therapeutic option. Investigations involving children with catastrophic epilepsy syndromes require well-conceived double-blinded placebo protocols. Not only are many of these children “at the end of the road” of therapeutic options, but some families have invested heavily to move to states with legalized cannabis, and the intense desire for a successful therapy can impact clinical trial results.

As would be expected, well-intentioned and well-informed physicians, lawmakers, patients, and parents come down on different sides of the cannabis question, but in states that have chosen to legalize cannabis, failure to understand the intense desire of a large population of patients with epilepsy to use medical cannabis for the treatment of epilepsy[14] is foolish at best and dangerous at worst. In Colorado we are at “ground zero” for this debate, and it behooves us to educate the public, quiet the frenzy, and inform the proper design and execution of clinical research that will answer the question of whether high concentration CBD cannabis is an effective antiepileptic agent.

Disclosure or Conflict of Interest

None of the authors has any conflict of interest to disclose. Furthermore, Dr. Maa wishes to explicitly state that he does not have a treatment relationship with Charlotte Figi, and as faculty at University of Colorado and Denver Health and Hospitals does not provide prescriptions for medical marijuana or sign for Colorado State Medical Marijuana Registrations. We confirm that we have read the Journal's position on issues involved in ethical publication and affirm that this report is consistent with those guidelines.

2nd International Congress on ADHD 21-24 May 2009 - Vienna (Aust.) Medicinal Cannabis: How Cannabinoids Can Help Treating ADHD?

Dr David Bearman MD (USA, Ca.)

Ludovic Brodusch, M.Sc.A.Ing. (Fr.)

Nicolas Wagener (Lux.)

This work is a review of the **Endocannabinoid System (ECS)** implication in ADHD. It reports two European cases, sample of the growing number of Medicinal Cannabis (MC) recommended/prescribed for the treatment of ADHD cases. Scientific studies have demonstrated a relation between cannabinoid receptors (CB1, CB2), endocannabinoids Anandamide, 2-Arachidonylglycerol), the **Central Nervous System** and the **Neuro-immune System**¹². CB1 receptors, abundant in the brain, interact with the **Dopaminergic System**³⁴⁵⁶⁷. Genetic studies found a correlation between Cannabinoids Receptors Gene and ADHD⁸. Regarding behaviour, CB1 are possible targets to reduce hyperimpulsivity⁹¹⁰, Tourette Syndrome tics¹¹, fears¹²¹³, anxiety¹⁴¹⁵ and improve emotional learning (synaptic plasticity¹⁶) and distractibility¹⁷¹⁸. The neuro-chemical mechanism of action is **Retrograde Signaling Inhibition**¹⁹. This is dopamine mediated. An increase in unbound cannabinoid levels leads to cannabinoids replacing dopamine

bound to dopamine transporters binding sites. With more dopamine available to slow down the speed of neurotransmission there are fewer, slower moving neural inputs and the cerebral cortex has a better opportunity to focus and attend to the neural stimulation. Cannaboids are accepted by many cannabinoid medicine specialists for treating ADHD. Two patients, from **Luxembourg** (52, retired policeman) and **France** (35, engineer), had the opportunity to experiment MC therapy with Dutch products²⁰, available in pharmacies since 2005. Both report an improvement of their condition and chronic symptoms (distractibility, agitation, alcoholism, depression, anxiety, obsessive/suicide thoughts), without unacceptable side effects. CBD, no-psychoactive cannabidiol, was found necessary to reduce anxiety and adverse dronabinol effects²¹ (**dronabinol/CBD ratio: 1/1-3/1**). MC therapy was considered complementary to psychotherapy. Both clinical experience, particularly in California, and scientific data suggest that targeting ECS with exocannabinoids is an exciting new alternative to treat ADHD. Many doctors, who have experience with patients, recommend cannabinoids for ADHD²². **Further clinical studies** are required to investigate this new field.

(n) Knowledge of, and experience with, producing CBD/low-THC products:

Given the fact that there are no operational facilities in the state of Florida that can legally produce these products, the medical director has to rely on getting exposure/experience from facilities in California and Colorado.

Dr. Duncan has served as the Medical Director of a compounding pharmacy for over five years and has extensive experience in the field of producing medical grade products from plant based sources. The bio-identical hormones are all plant based and the extraction processes and forms of final product are similar. These hormones are made in a topical, injectable, trans-vaginal and oral form. The similarities are such that the same plant operations could be easily converted from the production of one to the other.

The medical director has been in association with several facilities in those states where cannabis is produced for medical use and has gained knowledge of techniques currently considered to be industry standards in the area of extraction/packaging, inventory control and tracking. All of which are unique to the CBD/THC products.

(o) Experience with or knowledge of botanical medicines:

Referencing to (m.) our medical director has experience with botanical medications in both the research and development phase being the medical director of a compounding pharmacy and over fifteen years' experience in prescribing and treating patients. He is currently considered the expert in this field in his practice region.

Having completed extensive research in botanical based medicine i.e. bio-identical hormones our Medical Director has a good working knowledge of the many components that go into the extraction and production of those medications. THC/CBD based products have similar production processes that preserve the original chemical structures thus allowing for a purer result. This is the same basis that the bio-identical medications follow.

4. Experience with dispensing medications:

North Florida Group Medical Director dispenses medications through all three of his current medical facilities and has done so for the last eleven years. Our Medical Director is very competent in record keeping and inventory control along with the tracking of any and all product that is wasted. He regularly trains his staff on the current regulations and best practices involved in staying compliant. A major component of this is the storage, proper labeling and disposal of out dated and/or contaminated product along with appropriate documentation.

Our Medical Director's medical facilities follow and meet all current Florida Board of Pharmacy guidelines and Florida statues. All facilities are inspected and we have good standing with the state of Florida regulatory division.

5. Description of how the medical director will supervise the activities of the Dispensing Organization:

The position of Medical Director is of the upmost importance and will be a full time position. Having already spent countless hours and working closely with the Nurseryperson/Grower to ensure aseptic techniques will be followed in the grow phase of our production.

When the cannabis is later extracted and made into an oil form our facility will use the industry standards, as stated in a previous section, and the medical director will monitor this process having set up protocols that follow Good Manufacturing Practices which too is spelled out in a prior section. The tracking system will be in place and serve to avoid any diversion.

Similar to our current dispensing offices, our company will have a system in place that will track product from ground to patient. Our system will utilize a computer tracking system which will account for all products, patients who receive medications, patient caretaker if applicable, as well as the prescribing physician's eligibility.

Patient education is very important and plans for an interactive website are already in place as well as an "in-office" Question and Answer area so patients can receive one on one instruction for use by medically trained staff. The key to proper educations is first informing prescribing physicians of the proper ways to educate their patients and providing a toll free question and answer line for both physicians and patients.

In order for all this to be possible, our company is focused on hiring licensed medical personnel with background in medication education. Our focus will be on continuing training by our in house physicians as well as courses offered by Department of Health and/or the State of Florida. With extensive and continuous training of staff, our Medical Director will be able to rotate visiting each dispensary and will hire a supervisor at each location for day to day operation. This supervisor will be solely responsible for inventory control and storage thus allowing for daily inventories in each dispensary and weekly or more frequent inventory updates throughout the company.

Using state of the art bar coding and having already joined with industry leaders in this area which have a tried and tested operational plan currently being used in over ten states we feel

assured that this is the safest way to monitor for diversion, have the ability for product recall, and inventory tracking.

4. Description of how the Dispensing Organization will ensure it has a medical director at all times.

By employing two very capable Deputy Medical Directors with impeccable experience and references, both of which are currently involved in an advisory position within our company, we are committed to making sure that patients in the state of Florida will always have access to much needed medications. Both of these physicians are experienced in the field of pain control and are dedicated to improving our profession. They both are big advocates of medical cannabis and have pledged to work with all diligence to see that patients are taken care of in the most professional way.

By having a two Deputy Medical Directors, who are capable and available to assume the Medical Director position if needed, our company is prepared to meet the needs of all patients within the state of Florida at any time.

Attachment: Resumes:Medical Director & Deputy Directors

GEORGE JOHN ARCOS, D.O.
4767 Merlot Drive
Rockledge, FL 32955

Home: (321) 631-6989
Cell: (321) 607-0200

**PROFESSIONAL
EXPERIENCE**

Interventional Pain Specialist, 2014 – Present
Florida Pain Institute – Merritt Island, Florida

President, Interventional Pain Specialist, 2003 - 2014
Pain Institute of North Florida, P.A., Tallahassee, FL

Interventional Pain Specialist, 2002 - 2003
Pain Management Center of Southern Indiana, P.A., Bloomington, IN

Chief of Anesthesiology, 2001 - 2002
Alliance Anesthesia, Lake City, FL

Interventional Pain Specialist, 2000 - 2001
Pain Center of Central Florida, P.A., Orlando, FL

Medical Director Pain Management Service, 1999 - 2000
North Florida South Georgia Veterans Health System – Gainesville, FL

Staff Anesthesiologist, Director of Pain Management, 1998 - 1999
Shands at AGH. - Gainesville, FL

Staff Anesthesiologist/Assistant Director of Pain Management, 1991 - 1997
Anesthesia Associates of Broward County - Plantation, FL

Chief of Anesthesia Services/Director of Pain Treatment Center, 1987 – 1990
USAF Hospital – Homestead AFB, FL

Staff Anesthesiologist, 1986 – 1987
USAF Regional Hospital – Maxwell AFB, FL

**TEACHING
APPOINTMENTS**

Clinical Assistant Professor of Anesthesiology/Pain Management, 2010 - 2013
Florida State University College of Medicine – Tallahassee, FL

Clinical Assistant Professor of Anesthesiology/Pain Management Service, 1997 - 2000
University of Florida College of Medicine - Gainesville, FL

Clinical Assistant Professor of Anesthesiology, 1991- 1997
Nova Southeastern University of Health Sciences – Davie, FL

Clinical Assistant Professor of Anesthesiology, 1990 - 1991
University of Miami School of Medicine, Jackson Memorial Hospital - Miami, FL

EDUCATION

Bachelor of Science, 1979
University of Florida - Gainesville, FL

Doctor of Osteopathy, 1983
New York College of Osteopathic Medicine - Old Westbury, NY

POST GRADUATE TRAINING

Rotating Internship, 1983 – 1984
Sun Coast Hospital - Largo, FL

Residency in Anesthesiology, 1984 – 1986
University of Medicine and Dentistry of New Jersey - Cherry Hill, NJ

FELLOWSHIPS

Regional Anesthesia and Pain Medicine Training Program, 1987 – 1989
United States Air Force Regional Hospital – Homestead AFB, FL

Bioethics, 1997 – 1998
University of Florida College of Medicine - Gainesville, FL

HONORS

Air Force Commendation Medal for Pain Management, 1990
Fellow - American Osteopathic College of Anesthesiology, 1995
Teacher of the Year - University of Florida College of Medicine, 1998
Secretary - Florida Society of Interventional Pain Physicians, 2010 - 2013
Patient's Choice Award for America's Most Compassionate Doctor, 2010 - 2012
Patient's Choice Award for Florida's Favorite Physician, 2009 - 2012
Leading Physician's of the World, 2013
Editorial Board; Pain Physicians Journal
Senior Training Consultant; Boston Scientific Corporation, 2004 - Present

BOARD CERTIFICATIONS

Diplomate, American Osteopathic Board of Anesthesiology
with subspecialty certification in Pain Management, April 2000 - #PM-555
Pain Management Recertification, 2010 - 2020
Diplomate, American Osteopathic Board of Anesthesiology, March 1991 - #555
Diplomate, American Academy of Pain Management, June 1991 - #2463
Associate, American Academy of Medical Acupuncture, October 1999 - #10023

LICENSURE

Florida, Georgia

MEMBERSHIPS

American Academy of Pain Medicine
American Osteopathic Association
American Pain Society
American Society of Anesthesiologists
American Society of Interventional Pain Physicians
Florida Society of Interventional Pain Physicians
Florida Osteopathic Medical Association
International Association for the Study of Pain
International Spinal Injection Society

PAPERS/ PRESENTATIONS

Isoflurane Anesthesia in a Patient with Myasthenia Gravis, presented at the American College of Anesthesiologists' 33rd Annual Convention – San Diego, CA - 1985

Midazolam Induced Ventricular Irritability (*Anesthesiology* 67:612, 1987)

Psychiatric Implications of Recovery Room Care, presented at the Broward County Post Anesthesia Nurse Association Convention – Cypress Creek, FL – May, 1994

**PAPERS
PRESENTATION**

Medical Malpractice I & II, presented at the American College of Anesthesiologists' Annual Convention – Williamsburg, VA – 1994

Anesthesiologists' 43rd Annual Convention – Naples, FL – 1995

Pediatric Anesthesia, presented at Universal Medical Center's Pediatric and Obstetrics Conference – Plantation, FL – 1996

Ethnic and Religious Issues with Florida Statute 765, presented at the Florida Bioethics Network Seminar – Gainesville, FL – May, 1998

The Bispectral Index Monitor (BIS), an analysis of the legal and ethical implications for anesthesiology, June 1998 Grant from Aspect Medical Corp., Allen, B., Mosley, R., Arcos, G. pgs. 1-24

Health Care Convention, Osteopathic Medicine, presented at the University of Florida – Gainesville, FL – January, 1998

Euthanasia: The Dutch Experiment, presented at the American College of Anesthesiologists' 46th Annual Convention – Dana Point, CA – October, 1998

Allen, B; Moseley R/ and Arcos, George J.: The Bispectral Index Monitor (BIS): Analysis of Legal and Ethical Implications for Anesthesiology, Program in Medical Ethics, Law, and the Humanities, University of Florida, 1998

Concepts of Pain Management, presented at the University of Florida College of Medicine – Gainesville, FL – August, 1999

End of Life Issues, presented at the University of Florida College of Medicine – Gainesville, FL – September, 1999

Chronic Pain Management, Acupuncture and Intra Muscular Stimulation, presented at the University of Florida College of Medicine – Gainesville, FL – February, 2000

Ethical Considerations for Anesthesia in the New Millennium, presented at the American College of Anesthesiologists 48th Annual Convention – Maui, Hawaii – September, 2000

References:

**John Downey, D.O.
Royal Pain Center
2922 Professional Parkway, Suite A
Augusta, GA 30907
Office: (706) 855-2767**

**Stephen Duncan, M.D.
2056 Centre Pointe Lane
Tallahassee, Florida 32308
Office: (850) 325-1212**

**Bill Heyser, M.D., D.C.
Southeast Spine Institute
1962 Village Green Way
Tallahassee, FL 32308
Office: (850) 668-0444**

CURRICULUM VITAE

KIRK J. MAURO, M.D.
2648 Centennial Place, Tallahassee, FL 32308
Phone: 850 402-0200 Fax: 850 402-0564

EMPLOYMENT

July 1995 - Present

Director - Medical Rehabilitation Specialist, 2648 Centennial Place, Tallahassee, FL 32308

2007-December 2014

Director of Therapy Services – Eden Springs Nursing and Rehabilitation, 4679 Crawfordville Hwy., Crawfordville, FL 32327

March 1994 – January 2006

Medical Director - HEALTHSOUTH Rehabilitation Hospital, 1675 Riggins Rd., Tallahassee, FL 32308
Awarded HEALTHSOUTH Medical Director of The Year 1995.

Pharmacology Clinical Advisor for HealthSouth and Florida A&M University, Preceptor for BS/Pharm D Students (1997-2005).

July 2002 – July 2003 (part-time)

Medical Director - Seven Hills Medical Center, 2807-B Capital Medical Blvd., Tallahassee, FL 32308

June 1997 - January 1999

Director of Rehabilitation Services - Blountstown Health and Rehabilitation Center, 224 Chipola Road, Blountstown, FL 32424

June 1992 - February 1994

Medical Director - Northwest Arkansas Rehab. Hospital, 153 E. Monte Painter Dr., Fayetteville, AR 72703

POST-GRADUATE CERTIFICATION

2001 - American Board of Physical Medicine and Rehabilitation (Recert. 2011)

1993 - American Board of Physical Medicine and Rehabilitation

1998 - American Board of Independent Medical Examiners

2006 - American Academy of Disability Evaluating Physicians

EDUCATION

Post-Graduate Training

1991-1992	Chief Resident St. Francis Medical Ctr. Pittsburgh, PA 15224	Physical Medicine & Rehab. Residency Program
1989-1991	St. Francis Medical Ctr. Pittsburgh, PA 15224	Physical Medicine & Rehab. Residency Program
1988-1989	St. Francis Medical Ctr. Pittsburgh, PA 15224	Internal Medicine Internship

Graduate

1985-1988	University of Pittsburgh School of Medicine Pittsburgh, PA 15260	M.D. - 1988 Admitted with Advanced Standing
1984-1985	Hahnemann University School of Medicine Philadelphia, PA 19102	

Undergraduate

1980-1984	University of Pittsburgh Pittsburgh, PA 15260	B.S. - 1984 Biology
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PROFESSIONAL SOCIETIES

American Academy of Electrodiagnostic Medicine, (1991 – present)
American Academy of Independent Medical Examiners
American Board of Disability Evaluating Physicians
American Academy of Physical Medicine and Rehabilitation
American Congress of Physical Medicine and Rehabilitation
American Academy of Academic Physiatrists (1992-1999)
Florida Medical Society
Capital Medical Society - Leon County
Brain & Spinal Cord Injury Advisory Council - State of Florida 1995

LICENSURES

Florida Medical License - ME0065574 (Issued January 21, 1994) Active
Georgia Medical License - 036725 (Issued June 1995) Active
Pennsylvania Medical License - MD-042470-L (Issued August 7, 1990) Active
Alabama Medical License - 17773 (Issued November 24, 1993) Active
California Medical License - G-069759 (Issued 9/10/90 *6/28/13) Active
Maryland Medical License – D0067694 (Issued May 23, 2008) Active
North Carolina Medical License – 2009-00026 (Issued 1/8/09) Active
South Carolina Medical License – MMD.33326 MD (Issued 1/12/2011) Active
Tennessee Medical License – MD49186 (Issued 8/29/12) Active
Texas Medical License – N8321 (Issued 11/30/10) Active
Illinois Medical License – 036.123883 (Issued 7/1/09) Active
Michigan Medical License – 4301101802 (Issued 8/6/12) Active
Utah Medical License – 8507715-1205 (Issued February 6, 2013) Active
DEA (Issued August 23, 1990) Active
Non-Pharmacy Dispensing License (Issued January 18, 2007) Active

STEPHEN W. DUNCAN, M.D.
2056 Centre Pointe Lane Tallahassee FL 32308
stephenduncanmd@yahoo.com
850-325-1212

EDUCATION

St. George University <i>Doctor of Medicine</i>	Grenada, WI 1991-1996
University of Mobile <i>Bachelor of Science in Chemistry</i> <i>Bachelor of Science in Biology</i>	Mobile, AL 1988-1990
Mississippi State University <i>Dual major Chemistry & Biology</i>	Starkville, MS 1981-1984

TRAINING

Medical Center of Central Georgia <i>Internal Medicine Residency</i>	Macon, GA 1996-1998
Medical Center of Central Georgia <i>Obstetrics & Gynecology Residency</i> <i>with emphasis on high risk obstetrics</i>	Macon, GA 1998-2000
Medical Center of Central Georgia <i>Chief Resident Obstetrics & Gynecology</i>	Macon, GA 2000-2001
Videonystagmography Balance Screening <i>Certified Physician</i>	Tallahassee, FL 2013

EXPERIENCE

Stephen W. Duncan, MD PL <i>OB/GYN High Risk Obstetrics</i>	Tallahassee, FL 2001-2011
Full Circle Midwife Group <i>Physician Supervisor/Backup</i>	Tallahassee, FL 2001-2004
Florida State Hospital <i>Staff Physician Mental Health Institute</i>	Chattahoochee, FL 2002-2011

Capital Regional Medical Center <i>Surgical Review Board</i>	Tallahassee, FL 2002-2007
North Florida Women's Health And Counseling Services <i>Staff Physician</i>	Tallahassee, FL 2003-2014
Resolutions Weight Loss Center <i>Owner/operator</i>	Panama City, FL 2005-Present
The Men's Center of North Florida <i>Owner/operator</i>	Tallahassee, FL 2008-Present
Stephen W. Duncan, MD PL <i>Private practice Gynecologist</i>	Tallahassee, FL 2011-Present
Centers for Healthy Living <i>Owner/operator</i>	Tallahassee, FL 2012-Present
Total Home Care Compounding Pharmacy <i>Medical Director</i> <i>Heading up Research and Development</i>	Tallahassee, FL 2012-2014
Warner Chilcott Company <i>National Lecturer</i>	2013-Present
Allure Lazer Institute <i>Medical Director</i>	Tallahassee, FL 2013- Present
North Florida Women's Services <i>Owner/operator</i>	Tallahassee, FL 2014-Present

CERTIFICATIONS

Essure Minimally Invasive Permanent Sterilization
First area physician certified

Certified Sotopelle Surgical Implants
One of only three physicians in North Florida

Certified Zerona Lazer Physician

Certified Tripolar Skin Rejuvenation

Advanced Cardiac Life Support

Pediatric Advanced Cardiac Life Support

Basic Cardiac Life Support

LICENSURE

Florida State Medical License

PROFESSIONAL MEMBERSHIPS

Americal Medical Association

Florida Medical Association

Capital Medical Society

NFIB Small Business Association

Who's Who World Registry

AWARDS AND HONORS

Full Scholarship Mississippi State University 1981-1984

**Department of Chemistry Award 1990
University Mobile**

**Jeffery L. Bourn Scholarship 1992
St. George University**

Presidential Award in Good Practice Management

Who's Who Worldwide Leadership Award

HOSPITAL AFFILIATION

Capital Regional Medical Center 2001-Present

COMMUNITY SERVICE

**Founder and Organizer of the Centers for Healthy Living
Annual Ronald McDonald House Fundraiser**

**Guest Lecturer for Tallahassee Community College
Menstrual Myths & Sexual Transmitted Diseases**

PERSONAL

Date of Birth: 12-1-1962

Marital Status: Single

Hobbies: Golf, Skiing, Deep Sea Fishing

REFERENCES

Available upon request

NorthWest Compassionate Care, Inc.

Application for Low THC Cannabis Dispensing Organization Approval

Financial

a. Certified Financials issued within the immediately preceding 12 months;

Please see attached financials

b. Applicant's corporate structure;

Tree King Tree Farm, Inc. is a C-Corporation with 2000 shares of stock issued. [REDACTED] are owned by NWGroup, Inc.. [REDACTED] are owned by Gerard L'Heureux the original nurseryman, [REDACTED] are owned by L'Heureux's attorney Robert Buck and [REDACTED] are owned by Louis Rotundo.

NWGroup, Inc. is a corporation with 1000 shares of stock. [REDACTED] are owned by Dr. Stephen Duncan, [REDACTED] are owned by Shannon Rosier and [REDACTED] are owned by Baxter Troutman.

c. All owners of the Applicant:

NWGroup Inc. own [REDACTED] of applicant. NWGroup, Inc. owners are Baxter Troutman, Dr. Stephen Duncan and Shannon Rosier.

Gerard L'Heureux owns [REDACTED] of the applicant.

Robert Buck owns [REDACTED] of the applicant

Louis Rotundo owns [REDACTED] of the applicant

d. All individuals and entities that can exercise control of the Applicant;

Control is maintained by majority share ownership. NWGroup, Inc. will have sole control on the applicant, which is owned by Baxter Troutman, Dr. Stephen Duncan and Shannon Rosier.

e. All individuals and entities that share in the profits and losses of the Applicant;

NWGroup, Inc. will absorb [REDACTED] of profits and losses

Gerard L'Heureux will absorb [REDACTED] of profits and losses

Robert Buck will absorb [REDACTED] of profit and losses

Louis Rotundo will absorb [REDACTED] of profits and losses

Be Mindful will retain [REDACTED] of Gross Sales as a Management Fee for production

f. All subsidiaries of the Applicant;

No subsidiaries

g. Any other individuals or entities for which the Applicant is financially responsible;

Devoe Moore & Baxter Troutman for any Line of Credit funds used.

h. Assets of the Applicant and Applicant's subsidiaries;

Irrevocable Line of Credit from Devoe Moore for [REDACTED]

Irrevocable Line of Credit from Baxter Troutman for [REDACTED]

See letters attached.

i. Liabilities of the Applicant and Applicant's subsidiaries;

Note Payables:

Regions Bank #4237 [REDACTED]

Regions Bank #8848 [REDACTED]

j. Any pending lawsuits to which the Applicant is a party;

None Known

k. Any lawsuits within the past 7 years to which the Applicant was a party;

None Known

l. All financial obligations of Applicant that are not listed as a "liability" in the Certified Financials:

None Known

m. A projected two year budget for the Dispensing Organization; and

see attached

n. Specific reference to sufficient assets available to support the Dispensing Organization activities.

Irrevocable Line of Credit from Devoe Moore for [REDACTED]

Irrevocable Line of Credit from Baxter Troutman for [REDACTED]

See letters attached.

Tree King Tree Farm, Inc.
 Operating Budget
 August 2015 through July 2016

Aug 15 Sep 15 Oct 15 Nov 15 Dec 15 Jan 16 Feb 16 Mar 16 Apr 16 May 16 Jun 16 July 16 TOTAL

Proprietary Information

Ordinary Income/Expense
Income
 Patient Fee Income
 - Prescriptions Filled
 Other Income - Education, Research, Etc...

Total Income
 OR
 Labor/Payroll - Plant Maintenance
 Be Mindful Grower -Contract 5%
 Utilities - Grow house
 Security Cost - Trident Agency

Total COGS
Gross Profit

Expense
 Accounting
 Advertising and Promotion
 Bank Charges - Safe Boxes
 Computer and Internet Expenses
 Consulting
 Meals and Entertainment (staff)
 Insurance - Health
 Interest Payable
 Labor Costs
 Legal Fees
 Transportation Expense
 Office Supplies
 Postage
 Equipment
 Repairs and Maintenance
 Payroll Expenses - Administrative
 Taxes
 Telephone Expense
 Travel Expense
 Utilities
Total Expense

Net Ordinary Income
Other Income/Expense
Other Expense
 Equity Dividends
 -NWGroup, Inc
 - Gerard L. Heurich, LLC

Total Other Expense
Net Other Income

TREE KING TREE FARM, INC.

FINANCIAL STATEMENTS

DECEMBER 31, 2014

CLEMENTS FINANCIAL SERVICES, INC.

Certified Public Accountants

TREE KING TREE FARM, INC.
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DECEMBER 31, 2014

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INDEPENDENT AUDITORS' REPORT

To the Stockholders
Tree King Tree Farm, Inc.

We have audited the accompanying financial statements of Tree King Tree Farm, Inc., which comprise the statements of assets, liabilities and equity as of December 31, 2014, and the related statements of revenue, expenses and retained earnings, 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 the *Financial Reporting Framework for Small- and Medium-Sized Entities* issued by the American Institute of Certified Public Accountants, described in Note 1; this includes determining that the *Financial Reporting Framework for Small- and Medium-Sized Entities* is an acceptable basis for the preparation of the financial statements in the circumstances. Management is also responsible for 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 our audits. We conducted our audits in accordance with auditing standards generally accepted in the United States of America. Those standards require that we plan and perform the audits to obtain reasonable assurance about whether the financial statements are free from material misstatement. An audit involves performing procedures to obtain audit evidence about the amounts and disclosures in the financial statements. The procedures selected depend on the auditor's judgment, including the assessment of the risks of material misstatement of the financial statements, whether due to fraud or error. In making those risk assessments, the auditor considers internal control relevant to the Company's preparation and fair presentation of the financial statements 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 Company'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 statements. We believe that the audit evidence we have obtained is sufficient and appropriate to provide a basis for our audit opinion.

Opinion

In our opinion, the financial statements referred to above present fairly, in all material respects, the financial position of Tree King Tree Farm, Inc., as of December 31, 2014, and the results of its operations and its cash flows for the year then ended in accordance with the *Financial Reporting Framework for Small- and Medium-Sized Entities*, described in Note 1.

Basis of Accounting

We draw attention to Note 1 of the financial statements, which describes the basis of accounting. The financial statements are prepared in accordance with the *Financial Reporting Framework for Small- and Medium-Sized Entities*, which is a basis of accounting other than accounting principles generally accepted in the United States of America. Our opinion is not modified with respect to this matter.

Carolyn Hurst, CPA
Clements Financial Services, Inc.

Tallahassee, Florida
July 3, 2015

TREE KING TREE FARM, INC.
STATEMENT OF ASSETS, LIABILITIES AND EQUITY
(FRF for SMEs BASIS)
FOR THE YEAR ENDED DECEMBER 31, 2014

ASSETS

Current assets

Cash	\$ [REDACTED]
Contracts receivable	[REDACTED]
Total current assets	[REDACTED]

Furniture, property and equipment, net of accumulated depreciation

[REDACTED]

Total Assets

[REDACTED]

LIABILITIES AND SHAREHOLDERS' EQUITY

Current liabilities

Accounts payable and accrued expenses	[REDACTED]
Current maturities of notes payable	[REDACTED]
Total current liabilities	[REDACTED]

Long-Term liabilities

Notes Payable, less current maturities	[REDACTED]
Total current liabilities	[REDACTED]

Shareholders' equity

Common Stock - \$1 par value, 2,000 authorized shares, 2,000 issued and outstanding shares	[REDACTED]
Retained earnings	[REDACTED]
Total shareholders' equity	[REDACTED]

Total liabilities and shareholders' equity

\$ [REDACTED]

See independent accountants' audit report and notes to financial statements

TREE KING TREE FARM, INC.
STATEMENT OF REVENUES, EXPENSES AND RETAINED EARNINGS
(FRF for SMEs BASIS)
FOR THE YEAR ENDED DECEMBER 31, 2014

Revenues		
Income from operations		\$ [REDACTED]
Other		[REDACTED] 0
Total support and revenues		[REDACTED]
Expenses		
Cost of revenues earned		[REDACTED]
General and Administrative expenses		[REDACTED]
Total expenses		[REDACTED]
Income before current year tax expense		[REDACTED]
Income tax expense		[REDACTED]
Net Income		[REDACTED]
Retained Earnings, end of year		\$ [REDACTED]

See independent accountants' audit report and notes to financial statements

TREE KING TREE FARM, INC.
STATEMENT OF CASH FLOWS
(FRF for SMEs BASIS)
FOR THE YEAR ENDED DECEMBER 31, 2014
Increase (Decrease) in Cash and Cash Equivalents

Cash Flows From Operating Activities

Net Income \$ [REDACTED]

Adjustments to reconcile net income to net cash provided by operating activities:

Depreciation and amortization [REDACTED]

Changes in assets and liabilities:

Increase (decrease) in:

Trade Receivables [REDACTED]

Accounts payable and accrued expenses [REDACTED]

Interest Paid [REDACTED]

Net cash used in operating activities [REDACTED]

Cash Flows From Investing Activities

Purchases of property, plant and equipment [REDACTED]

Net cash used in investing activities [REDACTED]

Cash Flow From Investing Activities

Proceeds from long term borrowings [REDACTED]

Net cash used in financing activities [REDACTED]

Net increase in cash and cash equivalents

Cash & cash equivalents at January 1, 2014 [REDACTED]

Cash & cash equivalents at December 31, 2014 [REDACTED]

See independent accountants' audit report and notes to financial statements

TREE KING TREE FARM, INC.
NOTES TO FINANCIAL STATEMENTS
DECEMBER 31, 2014

(1) **Summary of Significant Accounting Policies:**

- (a) **Basis of Accounting** – The accompanying financial statements have been prepared in accordance with the *Financial Reporting Framework for Small- and Medium- Sized Entities* issued by the American Institute of Certified Public Accountants, which is a special purpose framework and not U.S. generally accepted accounting principles (U.S.GAAP). The accounting principles comprising the framework are appropriate for the preparation and presentation of small- and medium-sized entity financial statements, based on the needs of the financial statement users and cost and benefit considerations. This special framework, unlike U.S. GAAP, does not require the recognition of deferred taxes. We have chosen the option to recognize only the current income tax assets and liabilities.
- (b) **Nature of Operations** – The Company is engaged in the sale of plants, whole trees and nursery supplies. The Company's work is performed in the Central Florida area and helped develop the landscaping and tree selection of the Walt Disney World landscaping designs. The Company manages the replacement of whole plant products throughout the parks and serves the general contractors needs for subdivision development.
- (c) **Use of Estimates** – The preparation of financial statements in conformity with the *Financial Reporting Framework for Small and Medium-Sized Entities* requires management to make estimates and assumptions that affect the reported amounts of assets and liabilities and the disclosure of contingent assets and liabilities at the date of the financial statements and the reported amounts of revenues and expenses during the reporting period. Actual results could differ from those estimates.
- (d) **Statement of Assets, Liabilities and Equity Classification** - The Company includes in current assets and liabilities retainage amounts receivable and payable under contracts, which may extend beyond one year. A one-year time period is used as the basis for classifying all other current assets and liabilities.
- (e) **Cash and Cash Equivalents** - For purposes of the consolidated statements of cash flows, the Company considers all highly liquid debt instruments purchased with an original maturity of three months or less to be cash equivalents.
- (f) **Accounts Receivable** – Accounts receivable are stated at the amount management expects to collect from balances outstanding at year-end. Based on management's assessment of the credit history with customers having outstanding balances and current relationships with them, it has concluded that realization losses on balances outstanding at year-end will be immaterial.

See independent accountants' audit report

TREE KING TREE FARM, INC.
NOTES TO FINANCIAL STATEMENTS
DECEMBER 31, 2014

- (g) **Property and Equipment** - Property and equipment are stated at cost. Depreciation is computed primarily using the straight-line method over the estimated useful lives of the assets, which range from 5 to 39 years. Leasehold improvements are amortized over the shorter of the useful life of the related assets or the lease term. Expenditures for repairs and maintenance are charged to expense as incurred. For assets sold or otherwise disposed of, the cost and related accumulated depreciation are removed from the accounts, and any related gain or loss is reflected in income for the period.
- (h) **Income Taxes** - For financial reporting purposes, the Company has elected to use the taxes payable method. Under that method, income tax expense represents the amount of income tax the Company expects to pay based on the Company's current year taxable income.
- (i) **Evaluation of Subsequent Events** - The Company has evaluated subsequent events through July 3, 2015, which is the date the financial statements were available to be issued.

(2) **Accounts Receivable:**

Contracts receivable consisted of the following at December 31, 2014:

	\$ 
	
	
	\$ 

(3) **Property and Equipment:**

December 31, 2014

Assets	
Land	\$ 
Buildings	
Equipment	
Furniture & Fixtures	
	\$ 

See independent accountants' audit report

**TREE KING TREE FARM, INC.
NOTES TO FINANCIAL STATEMENTS
DECEMBER 31, 2014**

(4) **Financing Activities:**

Notes Payable

The following is a summary of all notes payable:

Note payable to Regions Bank, collateralized by land and building,
due in monthly installments of [REDACTED] inclusive of interest at a rate of 6.75%. [REDACTED]

Unsecured note payable to Regions Bank, due in monthly payments of
Interest only at a rate of 8% and loan maturity date of January 2017. [REDACTED]

(5) **Contingencies:**

From time to time, the Company may be involved in routine litigation that arises in the ordinary course of business. There are no pending significant legal proceeding to which the Company is a party for which management believes the ultimate outcome would have a material adverse effect on the Company's financial position.

See independent accountants' audit report