CCS of Alabama, LLC Written Grounds for Redaction

CCS of Alabama, LLC ("CCSA") is an applicant for a medical marijuana dispensary license. CCSA understands that AMCC is an entity of the State of Alabama and any documents or data submitted to the State of Alabama may be disclosed by the State pursuant to an Alabama Public Information Request.

While Section 36-12-40 of the Alabama Code (the "Open Records Act") permits certain exclusions from disclosure, CCSA understands that AMCC or the State make no guarantee or promises that such data will not be disclosed. We have reviewed the Open Records Act, as well as relevant case law.

CCSA understands that the Exhibits and data provided to the Commission may not be confidential or trade secrets (as defined in Section 8-27-2(1) of the Alabama Code "Trade Secrets Act")), or if confidential or a trade secret, may or may not be disclosed pursuant to the Alabama Open Records Act and the Trade Secrets Act.

CCSA further understands that exhibits consisting of trade secrets or confidential information must be clearly marked and have included a legal justification for each exhibit so marked.

<u> Part I – Ownership</u>

Exhibit 1 – Resume or Curriculum Vitae of Individuals with Ownership Interest in Applicant

The Resume or Curriculum Vitae of Individuals with Ownership Interest in CCSA is both a trade secret, per § 8-27-2(1), Code of Alabama 1975 (as amended) and confidential information with a protectible interest, per § 8-1-191(a)(2), Code of Alabama 1975 (as amended). First, this Exhibit contains personally identifiable information as to the owners and investors of CCSA. Second, if this information were disclosed, CCSA's competitors would be able to infer details regarding the financial status of the company and its principals, which would allow those competitors to design business and operational plans

attempting to take advantage of this fact. Third, the information contained in each Resume or Curriculum Vitae includes personally identifiable information that, if disclosed, would have "an impact upon, the security and safety of [our Owners]."¹ The Company protects the secrecy of this information by limiting knowledge on a need-to-know basis and protecting the same with confidentiality agreements. Allowing this information to be released could provide nefarious persons with the necessary information to endanger the safety of our Owners.

Exhibit 2 - Residency of Owners

The records indicating the residency of CCSA's Owners are both trade secrets, per § 8-27-2(1), Code of Alabama 1975 (as amended) and confidential information with a protectible interest, per § 8-1-191(a)(2), Code of Alabama 1975 (as amended). The identities of the Company's employees, contractors and principals are highly guarded trade secrets protected by nondisclosure agreements. Especially if the Company wins a license, the Company's agents and principals could be identified by its competitors and poached, allowing the Company's competitors to secure superior personnel at little or no cost. This risk is magnified to CCSA versus other companies, as the Company's owners are often also its service providers. Additionally, the release of this personal information should be excluded from disclosure under the Open Records Act since disclosure would have "an impact upon, the security and safety of [our Owners]."² Allowing this information to be released could also provide bad actors with the means to endanger the safety of our Owners.

Exhibit 3 – Criminal Background Check

The information contained in the records requested, including: (1) Form B: Background Check Applicant Verification; (2) Form C: State Background Check (ALEA); (3) Form D: National Background Check (FBI); and (4) Form: Background Check Individual Verification is both confidential information with a protectible interest, per § 8-1-191(a)(2), Code of Alabama 1975 (as amended) and a trade secret, per § 8-27-2(1), Code of Alabama 1975 (as amended). The identities of the Company's employees, contractors and principals are highly guarded trade secrets protected by nondisclosure agreements. Especially if the Company wins a license, the Company's agents and principals could be identified by its competitors and poached, allowing the Company's competitors to secure superior personnel at little or no cost. The Company protects the secrecy of this information by limiting knowledge on a need-to-know basis and protecting the same with confidentiality agreements. The release of this personal information should also be excluded from disclosure under the Open Records Act since disclosure would have "an impact upon, the security and safety of [our Owners]."³ Allowing this information to be released could provide those with malicious intentions the means to endanger the safety of our Owners.

Part II - Financial Ability

Exhibit 4 - Demonstration of Sufficient Capital

CCSA's demonstration of sufficient capital available to use, as well as the source of that capital, and verification of the same are both trade secrets, per § 8-27-2(1), Code of Alabama 1975 (as amended) and confidential information with a protectible interest, per § 8-1-191(a)(2)-(4)(a), Code of Alabama 1975 (as amended). The capitalization of the Company is obviously financial information, and the Company keeps such information highly confidential, both by limiting knowledge to senior management and through nondisclosure agreements, to ensure both the privacy of its investors and that its competitors are unaware of the depth of its resources. Disclosure would harm the economic advantage of the Company, in that competitors might be incentivized to pursue alternative or additional financing strategies upon realization that they lack comparable resources. Alternatively, a competitor with superior capitalization might be able to undersell versus the Company if it believes that the Company has weak enough capitalization not to survive such extended competition. The Company protects the secrecy of this information by limiting knowledge on a need-to-know basis and protecting the same with confidentiality agreements. Additionally, the release of personal information related to CCSA's ability to raise capital should be excluded from disclosure under the Open Records Act since disclosure would have "an impact upon, the security and safety of persons" (i.e., the sources of our capital).⁴ Allowing this information to be released could provide corrupt individuals with the means to endanger the safety of our sources of capital.

Exhibit 5 - Financial Statements

CCSA's current financial statements (including, but not limited to, our balance sheet report, profit and loss report, and statement of cash flow, and pro forma) are both trade secrets, per § 8-27-2(1), Code of Alabama 1975 (as amended) and confidential information with a protectible interest, per § 8-1-191(a)(2) & (3), Code of Alabama 1975 (as amended). This information has significant economic value, is not publicly known, and cannot be readily ascertained or derived from publicly available information.⁵ The Company protects the secrecy of this information by limiting knowledge on a need-to-know basis and protecting the same with confidentiality agreements. If this information were disclosed, CCSA's competitors would be able to infer details regarding the financial status of the company, including pricing information and methodology,⁶ which would allow those competitors to design business and operational plans attempting to take advantage of this fact.

Exhibit 6 - Tax Plan

CCSA's tax plan is both a trade secret, per § 8-27-2(1), Code of Alabama 1975 (as amended) and confidential information with a protectible interest, per § 8-1-191(a)(2) & (3), Code of Alabama 1975 (as amended). This section contains a detailed tax plan which allows the company to operate in a streamlined and efficient manner. This information has significant economic value, is not publicly known, and cannot be readily ascertained or derived from publicly available information.⁷ The Company protects the secrecy of this information by limiting knowledge on a need-to-know basis and protecting the same with confidentiality agreements.

Part III - Business/Management Approach

Exhibit 7 – Business Formation Documents

CCSA's Formation Documents (excluding our Certificate of Formation, which can be found on the Alabama Secretary of State's website) are both trade secrets, per § 8-27-2(1), Code of Alabama 1975 (as amended) and confidential information with a protectible interest, per § 8-1-191(a)(2), Code of Alabama 1975 (as amended). Our formation documents are "company provided . . . documents, . . . and forms" that contain financial and investment information, management plans, business strategy, techniques, internal methodologies; processes and procedures, and other confidential information, that if released could harm CCSA.⁸ If this information were disclosed, CCSA's competitors would be able to infer details regarding the operations of the company, which would allow those competitors to design business and operational plans attempting to take advantage of this fact. The Company protects the secrecy of this information by limiting knowledge on a need-to-know basis and protecting the same with confidentiality agreements.

Exhibit 8 - Business License and Authorization of Local Authorities

CCSA's Business License and Authorization from Local Authorities are both trade secrets, per § 8-27-2(1), Code of Alabama 1975 (as amended) and confidential information with a protectible interest, per § 8-1-191(a)(2) & (3), Code of Alabama 1975 (as amended). The Company derives economic benefit from the secrecy of this information. If this information were disclosed, CCSA's competitors would be able to infer details regarding CCSA's proposed facility location, which would allow those competitors to design business and operational plans attempting to take advantage of this fact. The Company protects the secrecy of this information by limiting knowledge on a need-to-know basis and protecting the same with confidentiality agreements. As such, the release of this personal information should be excluded from disclosure under the Open Records Act since disclosure would have "an impact upon, the security and safety of persons, structures, [and] facilities" of CCSA.⁹ The disclosure of this information could not only compromise the location of the Company's proposed facilities, but also the safety of individuals representing local licensing authorities.

Exhibit 9 – Business Plan

CCSA's business plan is both a trade secret, per § 8-27-2(1), Code of Alabama 1975 (as amended) and confidential information with a protectible interest, per § 8-1-191(a)(2)-(4), Code of Alabama 1975 (as amended). This information contains significant operational information that is not publicly known and cannot be readily ascertained or derived from publicly available information.¹⁰ In addition to internal operational information, this Exhibit contains personally identifiable information as to the owners and principals of CCSA. If this information were disclosed, CCSA's competitors would have a clear understanding of CCSA's business structure, goals, organizational chart, job descriptions, executive summary, our projected services, advertising/marketing strategies, community engagement plan, environmental impact statement, and insurance plan, which would severely disadvantage CCSA.¹¹ Access to this information would allow those competitors to design business and operational plans based on our work and best-in-class operational standards. The Company's business plan and the secrecy of the same are both of great importance to the Company's competitive edge and economic advantage. A business plan does nothing but outline a company's approach to marketplace success. The Company's economic benefit from the secrecy of this plan is twofold: first, the Company's business plan is of sufficiently high quality that it benefits from competitors not being able to simply copy it; second, knowledge of the Company's business plan could enable competitors to adopt their own plans deliberately targeting and undermining the Company. As a result, the Company protects the secrecy of this information by limiting knowledge on a need-to-know basis and protecting the same with confidentiality agreements. Additionally, the release of CCSA's Business Plan, and the personal and professional information contained therein, should be excluded from disclosure under the Open Records Act since disclosure would have "an impact upon, the security and safety of [our Owners and principals]."12 Allowing this information to be released could provide delinquent individuals with the means to endanger the safety of our Owners and principals.

Exhibit 10 – Evidence of Business Relationship with Other Licensees and Prospective Licensees.

CCSA's contracts, contingent contracts, and memoranda of understanding between ourselves and other licensees and prospective licensees are both trade secrets, per § 8-27-2(1), Code of Alabama 1975 (as amended) and confidential information with a protectible interest, per § 8-1-191(a)(2)-(4), Code of Alabama 1975 (as amended). CCSA prides itself on its ability to cultivate relationships with other licensees. Access to this information would provide our competitors with a view of our "business strategy" and "commercial relationships"¹³, without the work that goes into seeking out and engaging other licensees and prospective licensees. As such, the Company derives economic benefit from the secrecy of these relationships. The Company protects the secrecy of this information by limiting knowledge on a need-to-know basis and protecting the same with confidentiality agreements, as well as customary confidentiality clauses in all agreements with other licensees. Additionally, the personal and professional information contained in this Exhibit 10 should be excluded from disclosure under the Open Records Act since disclosure would have "an impact upon, the security and safety of persons, structures, [and] facilities."¹⁴ The disclosure of these relationships could provide criminals with the means not only to compromise the safety and security of our Company, but also that of those with whom we seek to develop relationships.

Exhibit 11 - Coordination of Information from Registered Certifying Physicians

CCSA's plan for receiving and coordinating information and certification from registered certifying physicians is both a trade secret, per § 8-27-2(1), Code of Alabama 1975 (as amended) and confidential information with a protectible interest, per \S 8-1-191(a)(2)-(4), Code of Alabama 1975 (as amended). The manner in which CCSA develops relationships with Registered Certifying Physicians is an internal process that we have developed, and it is not publicly known or readily ascertainable from public information.¹⁵ CCSA has invested considerable time and effort to produce a business strategy plan¹⁶ for receiving and coordinating information and certification with Registered Certifying Physicians. The Company derives significant economic value from the secrecy of this plan - from the fact that our competitors, lacking plans of comparable quality, will be less able to handle this process in a timely and efficient manner allowing CCSA to capture a greater share of the market. The Company protects the secrecy of this information by limiting knowledge on a need-to-know basis and protecting the same with confidentiality agreements. Additionally, the personal and professional information contained in this Exhibit 11 should be excluded from disclosure under the Open Records Act since disclosure would have "an impact upon, the security and safety of persons, structures, [and] facilities."¹⁷ The disclosure of this information could comprise the safety and security of Certifying Physicians and the Company.

Exhibit 12 - Point-of-Sale Responsibilities

CCSA's plan for its point-of-sale education, consultation, provisions for information, response to patient and caregiver questions, and instructions for use regarding all medical cannabis products are both trade secrets, per § 8-27-2(1), Code of Alabama 1975 (as amended) and confidential information with a protectible interest, per § 8-1-191(a), Code of Alabama 1975 (as amended). This information is proprietary in nature and includes information related to the Company's internal processes and procedures, software, and commercial relationships with point-of-sale operators.¹⁸ The Company derives substantial economic value from the secrecy of this plan, from the fact that our competitors, lacking plans of comparable quality, will be less able to handle this process in a timely and efficient manner allowing CCSA to capture a greater share of the market. The Company protects the secrecy of this information by limiting knowledge on a need-to-know basis and protecting the same with confidentiality agreements. Additionally, the information contained in this Exhibit 12 should be excluded from disclosure under the Open Records Act since disclosure would have "an impact upon, the security and safety of [our] facilities."¹⁹ Disclosure of this information could provide malicious persons with information helpful in breaching our point-of-sale software.

Exhibit 13 - Confidentiality of Patient Information

CCSA's plan for maintaining confidential information and providing cybersecurity for sensitive information with respect to patients and caregivers, including protocols for maintaining the confidentiality of patient information in accordance with HIPAA is both a trade secret, per § 8-27-2(1), Code of Alabama 1975 (as amended) and confidential information with a protectible interest, per § 8-1-191(a), Code of Alabama 1975 (as amended). This information is proprietary in nature and includes information related to CCSA's internal processes and procedures, company software, and commercial relationships with IT professionals.²⁰ The Company derives economic value from the secrecy of this plan, from the fact that our competitors, lacking plans of comparable quality, will be less able to handle this process in a timely and efficient manner allowing CCSA to capture a greater share of the market. The Company protects the secrecy of this information by limiting knowledge on a need-to-know basis and protecting the same with confidentiality agreements. Additionally, the information contained in this Exhibit 13 should be excluded from disclosure under the Open Records Act since disclosure would have "an impact upon, the security and safety of persons (including patients of our proposed facility), structures, [and] facilities."²¹ Disclosure of this plan could not only harm the Company but could compromise the safety and security of those with whom we seek to develop relationships.

Exhibit 14 - Money Handling and Taxes

CCSA's detailed plan for handling money and allocating and remitting taxes is both a trade secret, per § 8-27-2(1), Code of Alabama 1975 (as amended) and confidential information with a protectible interest, per § 8-1-191(a), Code of Alabama 1975 (as amended). This information is proprietary in nature and includes information related to CCSA's internal processes and procedures, company software, and commercial relationships with banks and other financial institutions and accounting professionals.²² The Company derives economic value from the secrecy of this plan, from the fact that our competitors, lacking plans of comparable quality, will be less able to handle this process in a timely and efficient manner allowing CCSA to capture a greater share of the market. The Company protects the secrecy of this information by limiting knowledge on a need-to-know basis and protecting the same with confidentiality agreements. Additionally, the information contained in this Exhibit 14 should be excluded from disclosure under the Open Records Act since disclosure would have "an impact upon, the security and safety of persons, structures, facilities, [and] other infrastructures."²³ Disclosure of this plan could not only harm the Company but could also compromise the safety and security of those financial professionals with whom we seek to develop relationships.

Part IV. - Operations Plans & Procedures

Exhibit 15 - Standard Operating Plan and Procedures

CCSA's verified Standard Operating Plan and Procedures, including its comprehensive IT plan; maintenance storage of medical cannabis plan; Quality Control/Quality Assurance Plan; Contamination and Recall Plan; Criminal Activity Plan; Emergency Procedures/Disaster Plan; Alcohol, Smoke, and Drug Free Workplace Plan; Employee Safety Plan; Confidential Information and Cybersecurity Plan; Tracking and Proper Disposal of cannabis waste plan; and Security Plan are all trade secrets, per § 8-27-2(1), Code of Alabama 1975 (as amended) and confidential information with a protectible interest, per § 8-1-191(a), Code of Alabama 1975 (as amended). This information is proprietary in nature and includes information related to CCSA's internal processes and procedures, company software, security policies, and commercial relationships with thirdparty professionals.²⁴ The Company derives economic value from the secrecy of this plan, from the fact that our competitors, lacking plans of comparable quality, will be less able to handle this process in a timely and efficient manner allowing CCSA to capture a greater share of the market. Our standard operating procedures are peerless within the industry and will enable the Company to regulate its operations far better than its competitors. The Company protects the secrecy of this information by limiting knowledge on a need-to-know basis and protecting the same with confidentiality agreements. Additionally, disclosure of this plan could not only compromise the safety and security of the Company but also of those we seek to develop relationships with. As such, the information contained in this Exhibit 15 should be excluded from disclosure under the Open Records Act since disclosure would have "an impact upon, the security and safety of persons, structures, facilities, [and] other infrastructures."25 Allowing this information to be released could provide wrongdoers with a roadmap for how to circumvent our various physical and cybersecurity systems protecting our business and facilities.

Exhibit 16 - Policies and Procedures Manual

The verified copy of CCSA's proposed Policies and Procedures Manual is a trade secret, per § 8-27-2(1), Code of Alabama 1975 (as amended) and confidential information with a protectible interest, per § 8-1-191(a), Code of Alabama 1975 (as amended). This information is proprietary in nature and includes information related to CCSA's internal processes and procedures, company software, security policies, and commercial relationships with third-party professionals.²⁶ The Company derives substantial economic value from the secrecy of this plan, from the fact that our competitors, lacking plans of comparable quality, will be less able to handle this process in a timely and efficient manner allowing CCSA to capture a greater share of the market. The Company protects the secrecy of this information by limiting knowledge on a need-to-know basis and protecting the same with confidentiality agreements. Additionally, the information contained in this Exhibit 16 should be excluded from disclosure under the Open Records Act since disclosure would have "an impact upon, the security and safety of persons, structures, facilities, [and] other infrastructures."²⁷ Allowing this information to be released could provide lawbreakers with a roadmap for how to circumvent our various physical and cybersecurity systems protecting our business and facilities.

Exhibit 17 - Receiving and Shipping Plan

CCSA's receiving and shipping plan, which includes, at a minimum, plans for receiving, storing, and dispensing prepared, packaged, and labeled batches of medical cannabis; ensuring that incoming medical cannabis is accompanied by the Secure Transporter's manifest and other appropriate documentation; information that will be included in the QR code; Secure Transport receipt of cannabis; plans for receiving and shipping cannabis to or from another licensee's facility; and outgoing medical cannabis testing are all trade secrets, per § 8-27-2(1), Code of Alabama 1975 (as amended) and confidential information with a protectible interest, per § 8-1-191(a), Code of Alabama 1975 (as amended). This information is proprietary in nature and includes information related to CCSA's internal processes and procedures, company software, security policies, and commercial relationships with third-party professionals.²⁸ The Company derives substantial economic value from the secrecy of this plan, from the fact that our competitors, lacking plans of comparable quality, will be less able to handle this process in a timely and efficient manner allowing CCSA to capture a greater share of the market. The Company protects the secrecy of this information by limiting knowledge on a need-to-know basis and protecting the same with confidentiality agreements. Additionally, the information contained in this Exhibit 17 should be excluded from disclosure under the Open Records Act since disclosure would have "an impact upon, the security and safety of persons, structures, facilities, [and] other infrastructures."²⁹ Allowing this information to be released could provide those with malicious intentions with a roadmap for when and where we plan to receive and ship our inventory.

Part V. - Facility Suitability & Infrastructure

Exhibit 18 – Facilities

Information related to CCSA's proposed facility, including the name and type of facility; its address; photographs; authorization to occupy; zoning approval; blueprints and floorplans; timetable for completion and commencement of operations; public availability of facility; and hours of operations is all trade secrets, per § 8-27-2(1), Code of Alabama 1975 (as amended) and confidential information with a protectible interest, per § 8-1-191(a), Code of Alabama 1975 (as amended). This information is proprietary in nature and includes information related to CCSA's internal processes and procedures, company software, security policies, and commercial relationships with third-party professionals.³⁰ The Company derives substantial economic value from the secrecy of this plan, from the fact that our competitors, lacking plans of comparable quality, will be less able to handle this process in a timely and efficient manner allowing CCSA to capture a greater share of the market. The Company protects the secrecy of this information by limiting knowledge on a need-to-know basis and protecting the same with confidentiality agreements. Additionally. the facility and infrastructure information contained in this Exhibit 18 should be excluded from disclosure under the Open Records Act since disclosure would have "an impact upon, the security and safety of persons, structures, facilities, [and] other infrastructures."31 Allowing this information to be released could provide burglars with a roadmap for where and how to enter our facilities.

Part VI. - Security Plan

Exhibit 19 - Security Plan

CCSA's Security Plan is both a trade secret, per § 8-27-2(1), Code of Alabama 1975 (as amended) and confidential information with a protectible interest, per § 8-1-191(a), Code of Alabama 1975 (as amended). This information is proprietary in nature and includes information related to CCSA's internal processes and procedures, company software, security policies, and commercial relationships with third-party professionals.³² The Company derives substantial economic value from the secrecy of this plan, from the fact that our competitors, lacking plans of comparable quality, will be less able to handle this process in a timely and efficient manner allowing CCSA to capture a greater share of the market. The Company protects the secrecy of this information by limiting knowledge on a

need-to-know basis and protecting the same with confidentiality agreements. Additionally, the security information contained in this Exhibit 19 should be excluded from disclosure under the Open Records Act since disclosure would have "an impact upon, the security and safety of persons, structures, facilities, [and] other infrastructures."³³ The disclosure of our security information would severely undermine the secure operations that we pride ourselves on maintaining.

Part VII. - Personnel

Exhibit 20 – Personnel

The roster of all personnel (all leaders and employees affiliated with CCSA) is confidential information with a protectible interest, per § 8-1-191(a), Code of Alabama 1975 (as amended). The names, street addresses, contact telephone numbers, email addresses, and social security numbers are all confidential information that if made public, could endanger the security or safety of our employees.³⁴ The identities of the Company's employees and contractors are highly guarded trade secrets protected by nondisclosure agreements. Especially if the Company wins a license, the Company's employees and contractors could be identified by its competitors and poached, allowing the Company's competitors to secure superior personnel at little or no cost. The Company protects the secrecy of this information by limiting knowledge on a need-to-know basis and protecting the same with confidentiality agreements. As such, the Company derives actual independent economic value from the fact that this information is not known to or readily ascertainable by its competitors. Additionally, the personal information contained in this Exhibit 20 should be excluded from disclosure under the Open Records Act since disclosure would have "an impact upon, the security and safety of persons (i.e., our personnel)."³⁵ Allowing this information to be released could provide degenerate schemers with the means to endanger the safety of the leaders and employees affiliated with CCSA.

Exhibit 21 - Business Leadership Credentials

The business credentials of CCSA's leadership team are both a trade secret, per § 8-27-2(1), Code of Alabama 1975 (as amended) and confidential information with a protectible interest, per § 8-1-191(a), Code of Alabama 1975 (as amended). The background

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information on its leadership team, including their education, experience, and other credentials that make them highly qualified to lead our proposed operations, is intended for use in our business, includes imbedded methodologies into our hiring focus and process, is not publicly known and cannot be readily ascertained easily, is a subject of protection within CCSA, and has inherent significant value.³⁶ We have vetted our company leaders and spent resources gathering this information into a single curriculum vitae for the business. Making this information public would provide our competitors with an unfair advantage and potentially expose our leadership team to security and safety threats. The Company protects the secrecy of this information by limiting knowledge on a need-to-know basis and protecting the same with confidentiality agreements. Additionally, the personal information contained in this Exhibit 21 should be excluded from disclosure under the Open Records Act since disclosure would have "an impact upon, the security and safety of persons (i.e., our leadership team)."³⁷ Allowing this information to be released could provide the criminally minded with the means to endanger the safety of our leaders.

Exhibit 22 – Employee Handbook

The employee handbook for CCSA is both a trade secret, per § 8-27-2(1), Code of Alabama 1975 (as amended) and confidential information with a protectible interest, per § 8-1-191(a), Code of Alabama 1975 (as amended). The confidential information included within our handbook includes pricing methodologies, compensations, financial information, management and marketing plans, business strategies, techniques, manuals, forms, and other processes, procedures, and unique training that we have spent considerable time and money developing.³⁸ Making this information public would provide our competitors with an unfair advantage, allowing less prepared operators to steal our handbook, eliminating our competitive advantage within the marketplace. The Company protects the secrecy of this information by limiting knowledge on a need-to-know basis and protecting the same with confidentiality agreements.

<u>Part VIII. – Quality Control & Testing</u> Exhibit 23 – Quality Control and Quality Assurance Plan

CCSA's quality control and quality assurance plan is both a trade secret, per 8-27-2(1), Code of Alabama 1975 (as amended) and confidential information with a protectible interest, per § 8-1-191(a), Code of Alabama 1975 (as amended). The steps we will take in the dispensing process, our plan for performing quality control and testing of qualified sampling of medical cannabis, and our plan for return and remediation or destruction of any failed test samples, involves our business strategy, techniques, and methodology for conducting those operations.³⁹ The Company derives economic value from the secrecy of these plans and procedures, from the fact that our competitors, lacking plans and procedures of comparable quality, will be less able to handle this process in a timely and efficient manner allowing CCSA to capture a greater share of the market. The Company protects the secrecy of this information by limiting knowledge on a need-to-know basis and protecting the same with confidentiality agreements. Additionally, the information contained in this Exhibit 23 should be excluded from disclosure under the Open Records Act since disclosure would have "an impact upon, the security and safety of persons, structures, facilities, [and] other infrastructures."⁴⁰ Disclosure of this plan could not only harm the Company but could also compromise the safety and security of our employees by providing those with malicious intent detailed knowledge of our business operations.

Exhibit 24 - Contamination and Recall Plan

CCSA's contamination and recall plan is both a trade secret, per § 8-27-2(1), Code of Alabama 1975 (as amended) and confidential information with a protectible interest, per § 8-1-191(a), Code of Alabama 1975 (as amended). The steps we will take in the event one or more of the products offered for sale at our dispensing site, including any lots or batches thereof, is determined to require recall, involves our business strategy, techniques, and methodology for conducting a recall.⁴¹ The Company derives substantial economic value from the secrecy of these plans and procedures, from the fact that our competitors, lacking plans and procedures of comparable quality, will be less able to handle this process in a timely and efficient manner allowing CCSA to capture a greater share of the market. The Company protects the secrecy of this information by limiting knowledge on a need-to-know basis and proceduring the same with confidentiality agreements. Additionally, the information contained in this Exhibit 24 should be excluded from disclosure under the Open Records Act since disclosure would have "an impact upon, the security and safety of structures, facilities, [and] other infrastructures."⁴² Disclosure of this plan could not only harm the Company but could also compromise the safety and security of our employees by providing corrupt individuals with detailed knowledge of our business operations.

Part IX - Marketing & Advertising

Exhibit 25 - Marketing and Advertising Plan

CCSA's marketing and advertising plan is both a trade secret, per 8-27-2(1), Code of Alabama 1975 (as amended) and confidential information with a protectible interest, per § 8-1-191(a), Code of Alabama 1975 (as amended). The information contained in this plan includes pricing information and methodologies, potential customer data and information, marketing plans, business strategies and techniques, and commercial relationships.⁴³ The Company derives substantial economic value from the secrecy of these plans and procedures, from the fact that our competitors, lacking plans and procedures of comparable quality, will be less able to handle this process in a timely and efficient manner allowing CCSA to capture a greater share of the market. The Company protects the secrecy of this information by limiting knowledge on a need-to-know basis and protecting the same with confidentiality agreements. Additionally, the information contained in this Exhibit 25 should be excluded from disclosure under the Open Records Act since disclosure would have "an impact upon, the security and safety of persons (i.e., our customers and third parties)."⁴⁴ Disclosure of this plan could not only compromise our operational edge but also the security and safety of customers and third parties with whom we plan to develop relationships.

Exhibit 26 - Website and Social Media

Providing a complete site map of each website, social media page, and other online sites owned and operated by CCSA is both a trade secret, per § 8-27-2(1), Code of Alabama 1975 (as amended) and confidential information with a protectible interest, per § 8-1-191(a), Code of Alabama 1975 (as amended). Such confidentiality and trade secret protection will last until we are issued a license and these webpages and social media platforms go live. Until that time, our internal media strategy is confidential information involving our business and marketing strategies.⁴⁵ The Company derives economic value from the secrecy of these strategies, from the fact that our competitors, lacking strategies of comparable quality, will be less able to handle this process in a timely and efficient manner allowing CCSA to capture a greater share of the market. Until these strategies become public, the Company does, and will, protect the secrecy of this information by limiting knowledge on a need-to-know basis and protecting the same with confidentiality agreements.

¹ § 36-12-40, Code of Alabama 1975 (as amended).

² § 36-12-40, Code of Alabama 1975 (as amended).

³ § 36-12-40, Code of Alabama 1975 (as amended).

⁴ § 36-12-40, Code of Alabama 1975 (as amended).

⁵ § 8-27-2(1)(c), (d), (f), Code of Alabama 1975 (as amended).

⁶ § 8-1-191(a)(2), Code of Alabama 1975 (as amended).

⁷ § 8-27-2(1)(c), (d), (f), Code of Alabama 1975 (as amended).

⁸ § 8-1-191(a)(2), Code of Alabama 1975 (as amended).

⁹ § 36-12-40, Code of Alabama 1975 (as amended).

 $^{^{10}\,\$\,8\}text{-}27\text{-}2(1)(c),\,(d),\,(f),\,Code \text{ of Alabama 1975}$ (as amended).

¹¹ § 8-1-191(a)(2), Code of Alabama 1975 (as amended).

¹² § 36-12-40, Code of Alabama 1975 (as amended).

¹³ § 8-1-191(a)(2)-(3), Code of Alabama 1975 (as amended).

¹⁴ § 36-12-40, Code of Alabama 1975 (as amended).

¹⁵ § 8-27-2(1)(a)-(b), Code of Alabama 1975 (as amended).

¹⁶ § 8-1-191(a)(2)-(3), Code of Alabama 1975 (as amended).

¹⁷ § 36-12-40, Code of Alabama 1975 (as amended).
¹⁸ § 8-1-191(a)(2)-(3), Code of Alabama 1975 (as amended).

¹⁹ § 36-12-40, Code of Alabama 1975 (as amended).

²⁰ § 8-1-191(a)(2)-(3), Code of Alabama 1975 (as amended).

²¹ § 36-12-40, Code of Alabama 1975 (as amended).

²² § 8-1-191(a)(2)-(3), Code of Alabama 1975 (as amended).

²³ § 36-12-40, Code of Alabama 1975 (as amended).

²⁴ § 8-1-191(a)(2)-(3), Code of Alabama 1975 (as amended).

²⁵ § 36-12-40, Code of Alabama 1975 (as amended).

²⁶ § 8-1-191(a)(2)-(3), Code of Alabama 1975 (as amended).

²⁷ § 36-12-40, Code of Alabama 1975 (as amended).

²⁸ § 8-1-191(a)(2)-(3), Code of Alabama 1975 (as amended).

²⁹ § 36-12-40, Code of Alabama 1975 (as amended).

³⁰ § 8-1-191(a)(2)-(3), Code of Alabama 1975 (as amended).

³¹ § 36-12-40, Code of Alabama 1975 (as amended).

³² § 8-1-191(a)(2)-(3), Code of Alabama 1975 (as amended).

- ³³ § 36-12-40, Code of Alabama 1975 (as amended).
- ³⁴ § 36-12-40, Code of Alabama 1975 (as amended).
- ³⁵ § 36-12-40, Code of Alabama 1975 (as amended).
- ³⁶ § 8-27-2(1)(a), (b), (c), Code of Alabama 1975 (as amended).
- ³⁷ § 36-12-40, Code of Alabama 1975 (as amended).
- ³⁸ § 8-1-191(a)(2), (4), Code of Alabama 1975 (as amended).
- ³⁹ § 8-1-191(a)(2) Code of Alabama 1975 (as amended).
- ⁴⁰ § 36-12-40, Code of Alabama 1975 (as amended).
- ⁴¹ § 8-1-191(a)(2) Code of Alabama 1975 (as amended).
- ⁴² § 36-12-40, Code of Alabama 1975 (as amended).
- ⁴³ § 8-1-191(a)(2), (3) Code of Alabama 1975 (as amended).
- ⁴⁴ § 36-12-40, Code of Alabama 1975 (as amended).
- ⁴⁵ § 8-1-191(a)(2) Code of Alabama 1975 (as amended).



Review

Help

Selected Account:

Your application has been filed with the Alabama Medical Cannabis Commission. Your reference code is **1611**.

File Date : 03/03/2023 12:17 PM

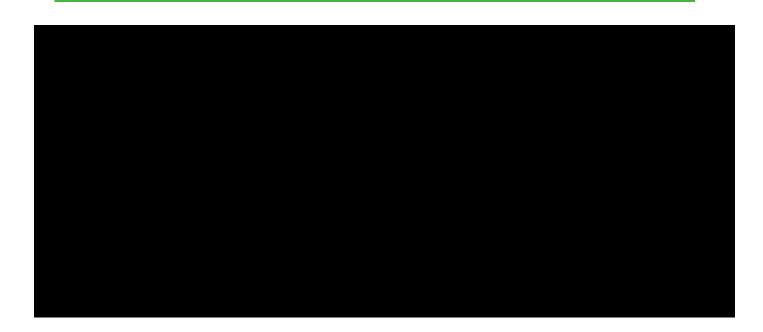
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If you do not receive email notifications, please check your spam folder.

You must print or save this page as a PDF as part of your redacted filing.

Request for Business Application Information

Request Number: 0429

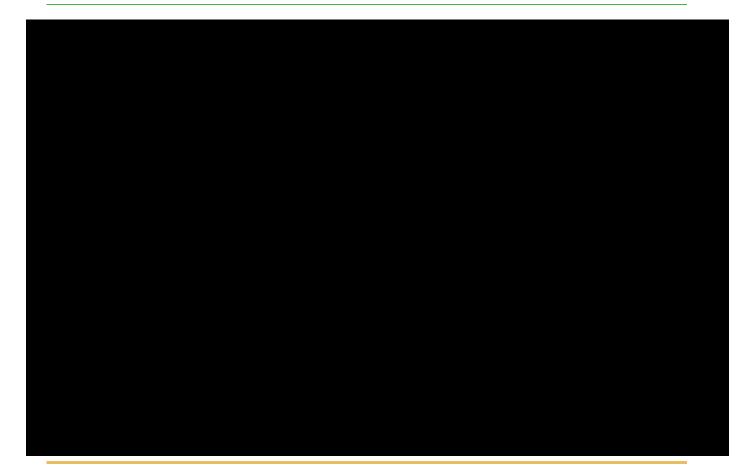




✔ License Type: Dispensary

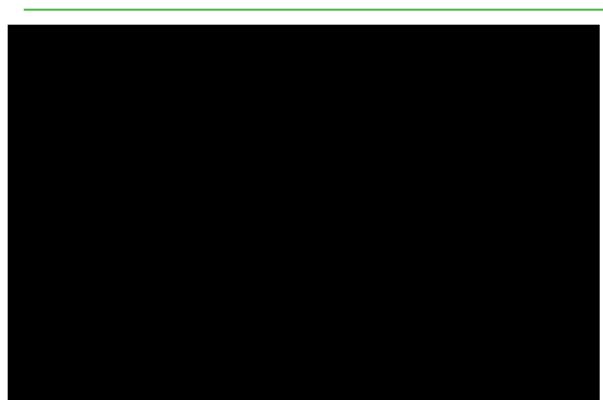
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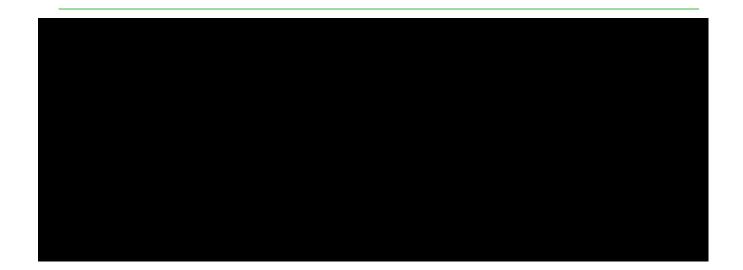
Physical Address



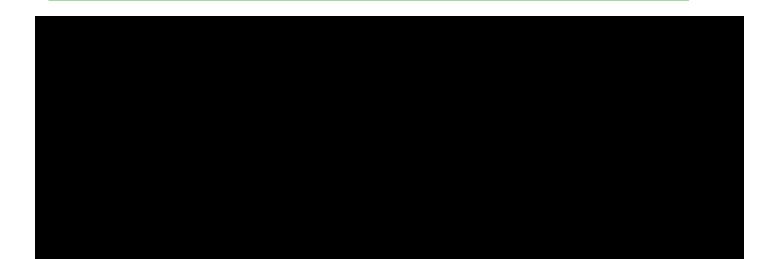




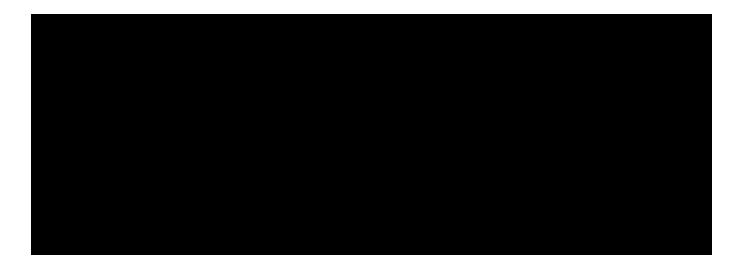






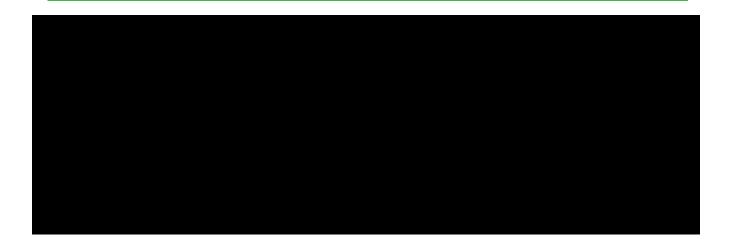




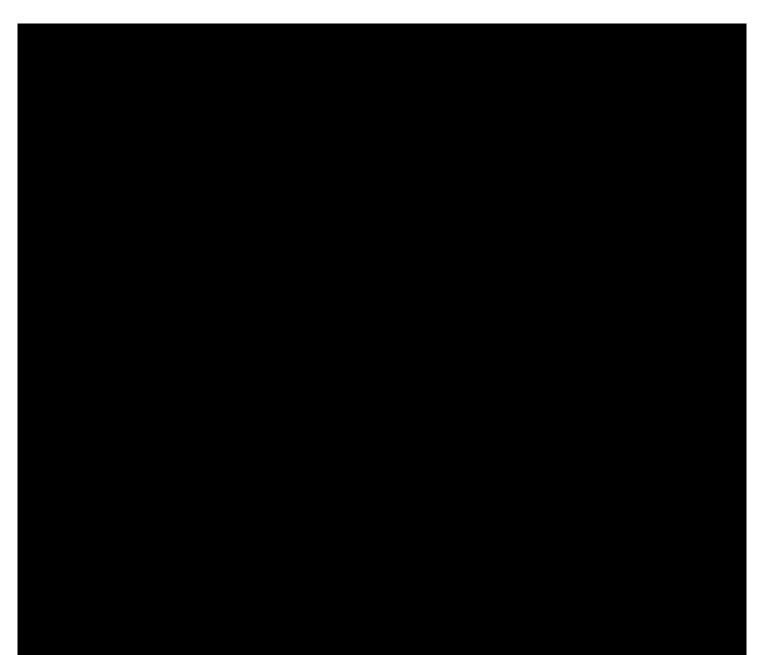














What is the applicant's anticipated or actual number of employees (including all facilities) at the prospective commencement of operations and during the first five calendar years thereafter?



Resume or Curriculum Vitae of Individuals with Ownership Exhibit 1_Resumes and CV.pdf (./api/documents/2rjte4HkP/do... Interest:

Residency of Owners:	Exhibit 2_Residency of Ownerspdf (./api/documents/hlnFo56
 Criminal Background Check: 	Exhibit 3_Criminal Background Check.pdf (./api/documents/ss
Demonstration of Sufficient Capital:	Exhibit 4_Demonstration of Sufficient Capital.pdf (./api/docum
✓ Financial Statements:	Exhibit 5_Financial Statements.pdf (./api/documents/Kx6xBrH
✔ Tax Plan:	Exhibit 6_Tax Plan.pdf (./api/documents/yJhPUM_a/download)
 Business Formation Documents: 	Exhibit 7_Business Formation Documents.pdf (./api/document
Business License and Authorization of Local Jurisdictions: Exhibit 8_Business License and Auth. of Local Authorities.pdf (
✓ Business Plan:	Exhibit 9_Business Plan.pdf (./api/documents/AkQObzUPO/do
 Evidence of Business Relationship with other Licensees and Prospective Licensees: 	Exhibit 10_Evidence of Business Relationship.pdf (./api/docum
 Coordination of Information from Registered Certifying Physicians: 	Exhibit 11_Coodination of Info From Physicians.pdf (./api/docu
✓ Point-of-Sale Responsibilities:	Exhibit 12_Point of Sale Responsibilities.pdf (./api/documents/
 Confidentiality of Patient Information: 	Exhibit 13_Confidentiality of Patient Information.pdf (./api/doc
✓ Money Handling and Taxes:	Exhibit 14_Money Handling and Taxes.pdf (./api/documents/ka
 Standard Operating Plan and Procedures: 	Exhibit 15_Standard Operating Procedures Plan.pdf (./api/docu
✓ Policies and Procedures Manual:	Exhibit 16_Policies and Procedures.pdf (./api/documents/sn9R
 Receiving and Shipping Plan: 	Exhibit 17_Receiving and Shipping Plan.pdf (./api/documents/
✓ Facilities:	Exhibit 18_Facilities.pdf (./api/documents/oT1Rdv7fp/downloa
✓ Security Plan:	Exhibit 19_Security Plan.pdf (./api/documents/mnTLqv0Od/do

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lty Insurance.pdf (./api/d
_gj/download)

Payments

✓ Payment Options: Credit Card

Exhibit 1 – Resume or Curriculum Vitae of Individuals with Ownership Interest

Verification

The undersigned verifies that the information contained in this Exhibit, including any attachments thereto, is accurate and complete, based on the best available information at the date of verification.

Vincent Schilleci III

Printed Name of Verifying Individual

Vincent Schilleci

Signature of Verifying Individual

Owner, Manager

Title of Verifying Individual

12/21/2022

Verification Date

Exhibit 2 – Residency of Owners

Verification

The undersigned verifies that the information contained in this Exhibit, including any attachments thereto, is accurate and complete, based on the best available information at the date of verification.

Vincent Schilleci III

Printed Name of Verifying Individual

Vincent Schilleci

Signature of Verifying Individual

Owner, Manager

Title of Verifying Individual

12/21/2022

Verification Date

Exhibit 3 – Criminal Background Check

Verification

The undersigned verifies that the information contained in this Exhibit, including any attachments thereto, is accurate and complete, based on the best available information at the date of verification.

Vincent Schilleci III

Printed Name of Verifying Individual

Vincent Schilleci

Signature of Verifying Individual

Owner, Manager

Title of Verifying Individual

12/21/2022

Verification Date

Exhibit 4 – Demonstration of Sufficient Capital

Verification

The undersigned verifies that the information contained in this Exhibit, including any attachments thereto, is accurate and complete, based on the best available information at the date of verification.

Vincent Schilleci III

Printed Name of Verifying Individual

Vincent Schilleci

Signature of Verifying Individual

Owner, Manager

Title of Verifying Individual

12/21/2022

Verification Date

Exhibit 5 – Financial Statements

Verification

The undersigned verifies that the information contained in this Exhibit, including any attachments thereto, is accurate and complete, based on the best available information at the date of verification.

Vincent Schilleci III

Printed Name of Verifying Individual

Vincent Schilleci

Signature of Verifying Individual

Owner, Manager

Title of Verifying Individual

12/21/2022

Verification Date

Exhibit 6 – Tax Plan

Verification

The undersigned verifies that the information contained in this Exhibit, including any attachments thereto, is accurate and complete, based on the best available information at the date of verification.

Vincent Schilleci III

Printed Name of Verifying Individual

Vincent Schilleci

Signature of Verifying Individual

Owner, Manager

Title of Verifying Individual

12/21/2022

Verification Date

Exhibit 7 – Business Formation Documents

Verification

The undersigned verifies that the information contained in this Exhibit, including any attachments thereto, is accurate and complete, based on the best available information at the date of verification.

Vincent Schilleci III

Printed Name of Verifying Individual

Vincent Schilleci

Signature of Verifying Individual

Owner, Manager

Title of Verifying Individual

12/21/2022

Verification Date

Exhibit 8 – Business License and Authorization of Local Authorities

Verification

The undersigned verifies that the information contained in this Exhibit, including any attachments thereto, is accurate and complete, based on the best available information at the date of verification.

Vincent Schilleci III

Printed Name of Verifying Individual

Vincent Schilleci

Signature of Verifying Individual

Owner, Manager

Title of Verifying Individual

12/21/2022

Verification Date

Exhibit 9 – Business Plan

Verification

The undersigned verifies that the information contained in this Exhibit, including any attachments thereto, is accurate and complete, based on the best available information at the date of verification.

Vincent Schilleci III

Printed Name of Verifying Individual

Vincent Schilleci

Signature of Verifying Individual

Owner, Manager

Title of Verifying Individual

12/21/2022

Verification Date

Exhibit 10 – Evidence of Business Relationship with Other Licensees and Prospective Licensees

Verification

The undersigned verifies that the information contained in this Exhibit, including any attachments thereto, is accurate and complete, based on the best available information at the date of verification.

Vincent Schilleci III

Printed Name of Verifying Individual

Vincent Schilleci

Signature of Verifying Individual

Owner, Manager

Title of Verifying Individual

12/21/2022

Verification Date

Exhibit 11 – Coordination of Information from Registered Certifying Physicians

Verification

The undersigned verifies that the information contained in this Exhibit, including any attachments thereto, is accurate and complete, based on the best available information at the date of verification.

Vincent Schilleci III

Printed Name of Verifying Individual

Vincent Schilleci

Signature of Verifying Individual

Owner, Manager

Title of Verifying Individual

12/20/2022

Exhibit 12 – Point-of-Sale Responsibilities

Verification

The undersigned verifies that the information contained in this Exhibit, including any attachments thereto, is accurate and complete, based on the best available information at the date of verification.

Vincent Schilleci III

Printed Name of Verifying Individual

Vincent Schilleci

Signature of Verifying Individual

Owner, Manager

Title of Verifying Individual

12/20/2022

Exhibit 13 – Confidentiality of Patient Information

Verification

The undersigned verifies that the information contained in this Exhibit, including any attachments thereto, is accurate and complete, based on the best available information at the date of verification.

Vincent Schilleci III

Printed Name of Verifying Individual

Vincent Schilleci

Signature of Verifying Individual

Owner, Manager

Title of Verifying Individual

12/20/2022

Exhibit 14 – Money Handling and Taxes

Verification

The undersigned verifies that the information contained in this Exhibit, including any attachments thereto, is accurate and complete, based on the best available information at the date of verification.

Vincent Schilleci III

Printed Name of Verifying Individual

Vincent Schilleci

Signature of Verifying Individual

Owner, Manager

Title of Verifying Individual

12/20/2022

Exhibit 15 – Standard Operating Plan and Procedures

Verification

The undersigned verifies that the information contained in this Exhibit, including any attachments thereto, is accurate and complete, based on the best available information at the date of verification.

Vincent Schilleci III

Printed Name of Verifying Individual

Vincent Schilleci

Signature of Verifying Individual

Owner, Manager

Title of Verifying Individual

12/21/2022

Exhibit 16 – Policies and Procedures Manual

Verification

The undersigned verifies that the information contained in this Exhibit, including any attachments thereto, is accurate and complete, based on the best available information at the date of verification.

Vincent Schilleci III

Printed Name of Verifying Individual

Vincent Schilleci

Signature of Verifying Individual

Owner, Manager

Title of Verifying Individual

12/21/2022

Verification Date

Exhibit 17 – Receiving and Shipping Plan

Verification

The undersigned verifies that the information contained in this Exhibit, including any attachments thereto, is accurate and complete, based on the best available information at the date of verification.

Vincent Schilleci III

Printed Name of Verifying Individual

Vincent Schilleci

Signature of Verifying Individual

Owner, Manager

Title of Verifying Individual

12/21/2022

Verification Date

Exhibit 18 – Facilities

Verification

The undersigned verifies that the information contained in this Exhibit, including any attachments thereto, is accurate and complete, based on the best available information at the date of verification.

Vincent Schilleci III

Printed Name of Verifying Individual

Vincent Schilleci

Signature of Verifying Individual

Owner, Manager

Title of Verifying Individual

12/21/2022

Verification Date

Exhibit 19 – Security Plan

Verification

The undersigned verifies that the information contained in this Exhibit, including any attachments thereto, is accurate and complete, based on the best available information at the date of verification.

Vincent Schilleci III

Printed Name of Verifying Individual

Vincent Schilleci

Signature of Verifying Individual

Owner, Manager

Title of Verifying Individual

12/21/2022

Verification Date

Exhibit 20 – Personnel

Verification

The undersigned verifies that the information contained in this Exhibit, including any attachments thereto, is accurate and complete, based on the best available information at the date of verification.

Vincent Schilleci III

Printed Name of Verifying Individual

Vincent Schilleci

Signature of Verifying Individual

Owner, Manager

Title of Verifying Individual

12/21/2022

Verification Date

Exhibit 21 – Business Leadership Credentials

Verification

The undersigned verifies that the information contained in this Exhibit, including any attachments thereto, is accurate and complete, based on the best available information at the date of verification.

Vincent Schilleci III

Printed Name of Verifying Individual

Vincent Schilleci

Signature of Verifying Individual

Owner, Manager

Title of Verifying Individual

12/21/2022

Verification Date

Exhibit 22 – Employee Handbook

Verification

The undersigned verifies that the information contained in this Exhibit, including any attachments thereto, is accurate and complete, based on the best available information at the date of verification.

Vincent Schilleci III

Printed Name of Verifying Individual

Vincent Schilleci

Signature of Verifying Individual

Owner, Manager

Title of Verifying Individual

12/21/2022

Verification Date

Exhibit 23 – Quality Control and Quality Assurance Plan

Verification

The undersigned verifies that the information contained in this Exhibit, including any attachments thereto, is accurate and complete, based on the best available information at the date of verification.

Vincent Schilleci III

Printed Name of Verifying Individual

Vincent Schilleci

Signature of Verifying Individual

Owner, Manager

Title of Verifying Individual

12/21/2022

Verification Date

Exhibit 24 – Contamination and Recall Plan

Verification

The undersigned verifies that the information contained in this Exhibit, including any attachments thereto, is accurate and complete, based on the best available information at the date of verification.

Vincent Schilleci III

Printed Name of Verifying Individual

Vincent Schilleci

Signature of Verifying Individual

Owner, Manager

Title of Verifying Individual

12/20/2022

Verification Date

Exhibit 25 – Marketing and Advertising Plan

Verification

The undersigned verifies that the information contained in this Exhibit, including any attachments thereto, is accurate and complete, based on the best available information at the date of verification.

Vincent Schilleci III

Printed Name of Verifying Individual

Vincent Schilleci

Signature of Verifying Individual

Owner, Manager

Title of Verifying Individual

12/21/2022

Verification Date

Exhibit 26 – Website and Social Media

Verification

The undersigned verifies that the information contained in this Exhibit, including any attachments thereto, is accurate and complete, based on the best available information at the date of verification.

Vincent Schilleci III

Printed Name of Verifying Individual

Vincent Schilleci

Signature of Verifying Individual

Owner, Manager

Title of Verifying Individual

12/21/2022

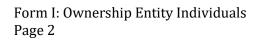
Verification Date

FORM I: OWNERSHIP ENTITY INDIVIDUALS

"Ownership Entity" – An entity that has any ownership interest in the Applicant.

Complete a separate form for each ownership entity, providing information and verification as to each individual having an indirect or direct ownership interest in the ownership entity. Attach additional forms if necessary.

For purposes of this form, if the ownership entity is a trust, disclose the names and addresses of all trustees and beneficiaries; if a privately held corporation, the names and addresses of all shareholders, officers, and directors; if a publicly held corporation, the names and addresses of all shareholders holding a direct or indirect interest of greater than five percent, officers, and directors; if a partnership or limited liability partnership, the names and addresses of all partners; if a limited partnership or limited liability limited partnership, the names and addresses of all partners, both general and limited; or if a limited liability company, the names and addresses of all members and managers.



FORM I: OWNERSHIP ENTITY INDIVIDUALS

"Ownership Entity" – An entity that has any ownership interest in the Applicant.

Complete a separate form for each ownership entity, providing information and verification as to each individual having an indirect or direct ownership interest in the ownership entity. Attach additional forms if necessary.

For purposes of this form, if the ownership entity is a trust, disclose the names and addresses of all trustees and beneficiaries; if a privately held corporation, the names and addresses of all shareholders, officers, and directors; if a publicly held corporation, the names and addresses of all shareholders holding a direct or indirect interest of greater than five percent, officers, and directors; if a partnership or limited liability partnership, the names and addresses of all partners; if a limited partnership or limited liability limited partnership, the names and addresses of all partners, both general and limited; or if a limited liability company, the names and addresses of all members and managers.

Owner Name	Role	% Ownership in Entity
Street Address		
City	State	Zip
Owner Name	Role	% Ownership in Entity
Street Address		
City	State	Zip
Owner Name	Role	% Ownership in Entity
Street Address		
City	State	Zip
Owner Name	Role	% Ownership in Entity
Street Address		
City	State	Zip

FORM I: OWNERSHIP ENTITY INDIVIDUALS

"Ownership Entity" – An entity that has any ownership interest in the Applicant.

Complete a separate form for each ownership entity, providing information and verification as to each individual having an indirect or direct ownership interest in the ownership entity. Attach additional forms if necessary.

For purposes of this form, if the ownership entity is a trust, disclose the names and addresses of all trustees and beneficiaries; if a privately held corporation, the names and addresses of all shareholders, officers, and directors; if a publicly held corporation, the names and addresses of all shareholders holding a direct or indirect interest of greater than five percent, officers, and directors; if a partnership or limited liability partnership, the names and addresses of all partners; if a limited partnership or limited liability limited partnership, the names and addresses of all partners, both general and limited; or if a limited liability company, the names and addresses of all members and managers.

Owner Name	Role	% Ownership in Entity
Street Address		
City	State	Zip
Owner Name	Role	% Ownership in Entity
Street Address		
City	State	Zip
Owner Name	Role	% Ownership in Entity
Street Address		
City	State	Zip
Owner Name	Role	% Ownership in Entity
Street Address		
	State	Zip



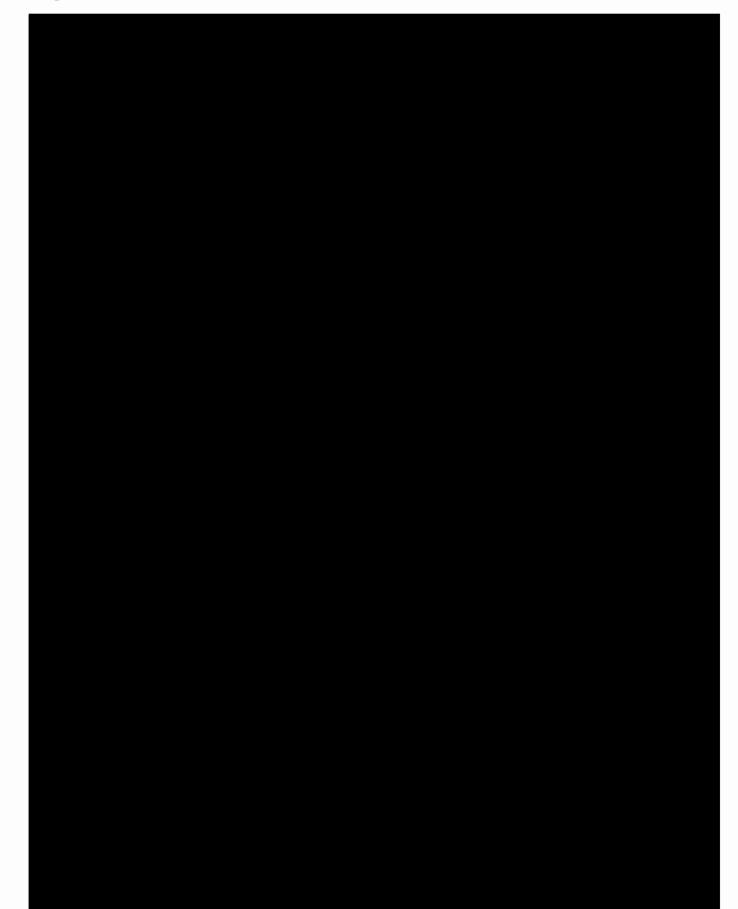




FORM K: Affidavit of Entity Applicant for Alabama Medical Cannabis License



Form K: Affidavit of Entity Applicant for Alabama Medical Cannabis License Page 2



FORM K: Affidavit of Entity Applicant for Alabama Medical Cannabis License Form K: Affidavit of Entity Applicant for Alabama Medical Cannabis License Page 2



WRITTEN AUTHORIZATION OF



WRITTEN AUTHORIZATION OF

