

## Request for Business Application Information

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0211

### General Applicant Information

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**Applicant Name:**

Aretha Dix

**Applying as:**

Business Entity

**Trade Name (DBAs):**

**Identification Number Type:**

FEIN

**Federal Tax Identification Number:**

██████████

**Business Entity Name:**

LeBleu Fields

**Business Entity Type:**

Limited Liability Company

**Secretary of State Entity ID Number:**

██████████

**Federal Business Code No:**

██████████

06/11/2022

### Applicant Street Address

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**Street:**

215 N PERRY ST

**Unit No / Apt No:**

**City:**

MONTGOMERY

**County:**

51-Montgomery

**State:**

Alabama

**Zip Code:**

36104

**Address Verified?:**

Yes

## Applicant Mailing Address

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**Street:**

215 N PERRY ST

**Unit No / Apt No:**

**City:**

MONTGOMERY

**State:**

Alabama

**Zip Code:**

36104

**Address Verified?:**

Yes

info@lebleufields.com

**Do you have a management service agreement in place?:**

No

**Is the applicant: (1) at least 51% owned by (or, in the case of a corporation, 51% of the shares belong to) members of any minority group (as defined by 20-2A-51(b)), and (2) managed and controlled in its daily operations by members of any minority group?:**

Yes

**Does the applicant verify that it is: (1) at least 51% owned by (or, in the case of a corporation, 51% of the shares belong to) members of any minority group (as defined by 20-2A-51(b)), and (2) managed and controlled in its daily operations by members of any minority group?:**

Yes

## Primary Contact Person

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**First Name:**

Aretha

**Last Name:**

Dix

**Title:**

Owner

**Phone Number:**

[REDACTED]

**Email:**

[REDACTED]

Email address will receive application notifications.

**Street:**

215 N PERRY ST

**Unit No / Apt No:**

**City:**



MONTGOMERY

**State:**

Alabama

**Zip Code:**

36104

Yes

## License Information

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Dispensary

## Facility Information

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Dispensary

## Ownership of Applicant

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Individual

## Cannabis Industry Entities

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Yes

Individual

## Questions and Attestations

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**Has the applicant, any ownership entity, or any cannabis entity connected to any individual or entity with an ownership interest in the applicant ever applied for or been granted any commercial license or certificate (not related to cannabis industry) issued by a licensing board or commission, either in Alabama or any other jurisdiction?:**

**YES**

Ownership Entity

**Was any commercial license or certificate disclosed above denied, restricted, suspended, revoked, or non-renewed?:**

**NO**

**Has the applicant, any ownership entity, or any cannabis entity connected to any individual or entity with an ownership interest in the applicant, ever been authorized to participate in the cannabis or medical cannabis industry, licensed (i.e., a "licensee" as defined in Chapter 1 of the AMCC Rules), or provided similar status in any other jurisdiction?:**

**YES**

Ownership Entity

During the last 5 years has there been any disciplinary measures taken regarding any cannabis or medical cannabis industry license of the applicant or any entity affiliated with the applicant?:

**NC**

Has the applicant, any ownership entity, or any cannabis entity connected to any individual or entity with an ownership interest in the applicant, within the last ten (10) years, filed or been served with a complaint or other notice by any governmental body, regarding a delinquency in the payment of, or a dispute over the filings concerning the payment of, any tax required under federal, state, or local law?:

**NC**

Has the applicant filed, or had filed against it, any proceeding for bankruptcy within the past 7 years?:

**NC**

Is the applicant currently, or has it been in the past 10 years, a defendant in litigation involving any of its business practices?:

**NC**

Is any public official of any unit of government:

- (1) an owner (directly or indirectly) of any financial or beneficial interest in the applicant;
- (2) a creditor of the applicant;
- (3) a holder of any debt instrument issued by the applicant; or (4) a holder of, or interested party in, any contractual or service relationship with the applicant?:

**NC**

Is the spouse, parent or child of a public official of any unit of government:

- (1) an owner (directly or indirectly) of any financial or beneficial interest in the applicant;
- (2) a creditor of the applicant;
- (3) a holder of any debt instrument issued by the applicant; or
- (4) a holder of, or interested party in, any contractual or service relationship with the applicant?:

**NC**

Has any owner, director, board member, or individual with a controlling interest in the applicant ever been indicted for, charged with, arrested for, convicted of, pled guilty or nolo contendere to, or forfeited bail concerning any felony or controlled substance-related misdemeanor, not including traffic violations, regardless of whether the offense has been reversed on appeal or otherwise?:

**NC**

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?

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Commencement of Operation:

10

Year One:

12

Year Two:

25

**Year Three:**

35

**Year Four:**

35

**Year Five:**

35

**Does the applicant verify that it has the ability to maintain adequate minimum levels (\$2,000,000) of liability and casualty insurance, as required by § 20-2A-53(a)(2), Code of Alabama 1975 (as amended)?:**

Yes

**Does the applicant verify that each of its proposed dispensing sites is at least 1000 feet from any school, daycare, or childcare facility?:**

**YES**

**Does the applicant consent as required by § 20-2A-55(d), Code of Alabama 1975 (as amended) to the inspections, examinations, searches, and seizures contemplated by § 20-2A-52(a)(3), Code of Alabama 1975 (as amended)?:**

Yes

**Does the applicant verify that neither it nor its leadership have any economic interest in any other license or applicant for license under the Act? (See § 20-2A-55(e), Code of Alabama 1975 (as amended)):**

**YES**

**I attest that this application is truthful and complete based on the best available information as of the date of filing.:**

**YES**

[Redacted Signature]

## Documents

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**Resume or Curriculum Vitae of Individuals with Ownership Interest:**

Document(s) Uploaded

**Residency of Owners:**

Document(s) Uploaded

**Criminal Background Check:**

Document(s) Uploaded

**Demonstration of Sufficient Capital:**

Document(s) Uploaded

**Financial Statements:**

Document(s) Uploaded

**Tax Plan:**

Document(s) Uploaded

**Business Formation Documents:**

Document(s) Uploaded

**Business License and Authorization of Local Jurisdictions:**

Document(s) Uploaded

**Business Plan:**

Document(s) Uploaded

**Evidence of Business Relationship with other Licensees and Prospective Licensees:**

Document(s) Uploaded

**Coordination of Information from Registered Certifying Physicians:**

Document(s) Uploaded

**Point-of-Sale Responsibilities:**

Document(s) Uploaded

**Confidentiality of Patient Information:**

Document(s) Uploaded

**Money Handling and Taxes:**

Document(s) Uploaded

**Standard Operating Plan and Procedures:**

Document(s) Uploaded

**Policies and Procedures Manual:**

Document(s) Uploaded

**Receiving and Shipping Plan:**

Document(s) Uploaded

**Facilities:**

Document(s) Uploaded

**Security Plan:**

Document(s) Uploaded

**Personnel:**

Document(s) Uploaded

**Business Leadership Credentials:**

Document(s) Uploaded

**Employee Handbook:**

Document(s) Uploaded

**Quality Control and Quality Assurance Plan:**

Document(s) Uploaded

**Contamination and Recall Plan:**

Document(s) Uploaded

**Marketing and Advertising Plan:**

Document(s) Uploaded

**Website and Social Media:**

Document(s) Uploaded

**Ownership Entity Individuals (if applicable):**

Document(s) Uploaded

**Minority Ownership Documents:**

Document(s) Uploaded

**Proof of Minimum Liability and Casualty Insurance:**

Document(s) Uploaded

**Affidavit - Entity Applicant:**

Document(s) Uploaded



FORM A: OWNERSHIP RESUME / CURRICULUM VITAE

LeBleu Fields

Business License Applicant Name

Aretha Dix

Individual with Ownership Interest in Applicant

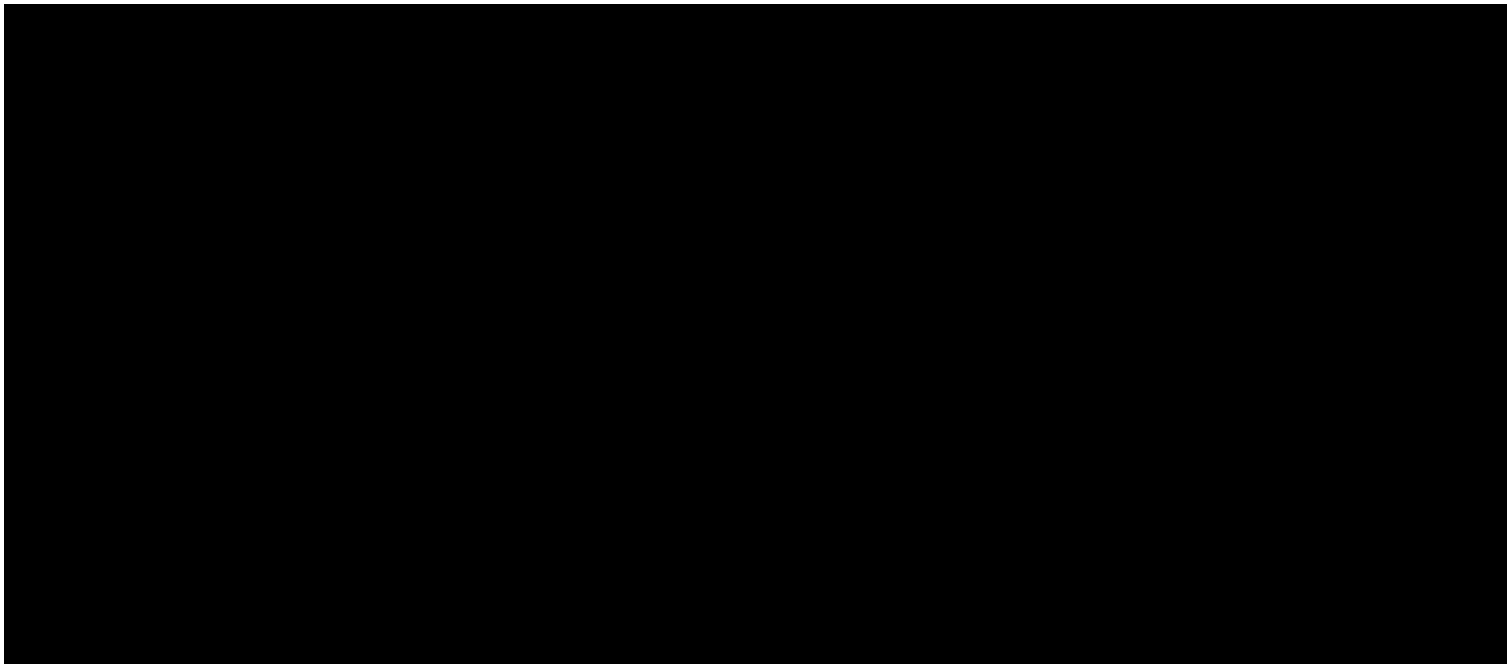
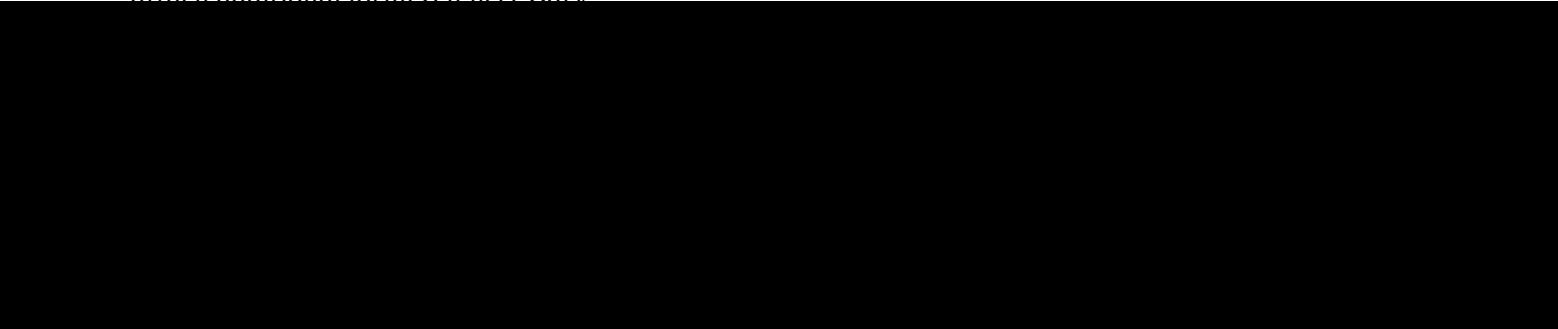
Dispensary

License Type

Individual's Ownership Percentage in Applicant

**Residential History**

*Provide all residential addresses, in reverse chronological order, for 15 years prior to date of application; attach additional form(s) if necessary.*



Residential Street Address

City

State

Zip

Date Resided From (MM/YYYY)

Date Resided To (MM/YYYY)

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Residential Street Address

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City

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State

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Zip

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Date Resided From (MM/YYYY)

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Date Resided To (MM/YYYY)

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Residential Street Address

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Date Resided From (MM/YYYY)

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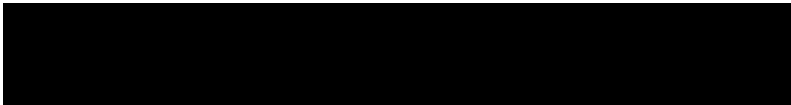
Date Resided To (MM/YYYY)

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Shaw AFB



Employer

Contact Person

Telephone

411 Polifka Dr.

Business Address

Shaw AFB

SC

29152

City

State

Zip

05/2010

05/2011

Date Employed From (MM/YYYY)

Date Employed To (MM/YYYY)

Shaw AFB



Employer

411 Polifka Dr.

Business Address

Shaw AFB

SC

29152

City

State

Zip

05/2008

05/2010

Date Employed From (MM/YYYY)

Date Employed To (MM/YYYY)

Employer

Contact Person

Telephone

Business Address

City

State

Zip

Date Employed From (MM/YYYY)

Date Employed To (MM/YYYY)

Employer

Contact Person

Telephone

Business Address

City

State

Zip

Date Employed From (MM/YYYY)

Date Employed To (MM/YYYY)

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Employer	Contact Person	Telephone
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Business Address

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City	State	Zip
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Date Employed From (MM/YYYY)	Date Employed To (MM/YYYY)
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Employer	Contact Person	Telephone
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Business Address

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City	State	Zip
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Date Employed From (MM/YYYY)	Date Employed To (MM/YYYY)
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Employer	Contact Person	Telephone
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Business Address

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City	State	Zip
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Date Employed From (MM/YYYY)	Date Employed To (MM/YYYY)
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Employer	Contact Person	Telephone
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Business Address

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City	State	Zip
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Date Employed From (MM/YYYY)	Date Employed To (MM/YYYY)
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FORM A: OWNERSHIP RESUME / CURRICULUM VITAE

LeBleu Fields

Business License Applicant Name

Brenda Sue Gunsallus

Individual with Ownership Interest in Applicant

Dispensary

License Type

Individual's Ownership Percentage in Applicant

**Residential History**

*Provide all residential addresses, in reverse chronological order, for 15 years prior to date of application; attach additional form(s) if necessary.*

[Redacted]

[Redacted]

[Redacted]

[Redacted]

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Residential Street Address

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City

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State

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Zip

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Date Resided From (MM/YYYY)

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Date Resided To (MM/YYYY)

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Residential Street Address

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Residential Street Address

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Zip

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Date Resided From (MM/YYYY)

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Date Resided To (MM/YYYY)

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**Circle S Farms**

**Self**

Employer

Contact Person

Telephone

**631 South Las Vegas Blvd.**

Business Address

**Las Vegas**

**NV**

**89101**

City

State

Zip

**01/2017**

**Present**

Date Employed From (MM/YYYY)

Date Employed To (MM/YYYY)

**Eastway Holdings, LLC**

**Self**

Employer

Contact Person

Telephone

**8588 NC Highway 150 E**

Business Address

**Terrell**

**NC**

**28682**

City

State

Zip

**02/2013**

**Present**

Date Employed From (MM/YYYY)

Date Employed To (MM/YYYY)

**The Tom Company**

**Self**

Employer

Contact Person

Telephone

Business Address

**Las Vegas**

**NV**

**89109**

City

State

Zip

**01/2008**

**Present**

Date Employed From (MM/YYYY)

Date Employed To (MM/YYYY)

**Matthews Tennis, Swim, and Golf Club**

**N/A**

Employer

Contact Person

Telephone

**2110 Pleasant Plains Rd.**

Business Address

**Matthews**

**NC**

**28105**

City

State

Zip

**03/1993**

**03/2008**

Date Employed From (MM/YYYY)

Date Employed To (MM/YYYY)

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Employer	Contact Person	Telephone
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Business Address

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City	State	Zip
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Date Employed From (MM/YYYY)	Date Employed To (MM/YYYY)
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Employer	Contact Person	Telephone
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Business Address

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City	State	Zip
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Date Employed From (MM/YYYY)	Date Employed To (MM/YYYY)
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Employer	Contact Person	Telephone
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Business Address

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City	State	Zip
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Date Employed From (MM/YYYY)	Date Employed To (MM/YYYY)
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Employer	Contact Person	Telephone
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Business Address

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City	State	Zip
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Date Employed From (MM/YYYY)	Date Employed To (MM/YYYY)
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FORM A: OWNERSHIP RESUME / CURRICULUM VITAE

LeBleu Fields

Business License Applicant Name

Darlene Alexandra Davis

Individual with Ownership Interest in Applicant

Dispensary

License Type

Individual's Ownership Percentage in Applicant

**Residential History**

*Provide all residential addresses, in reverse chronological order, for 15 years prior to date of application; attach additional form(s) if necessary.*

[Redacted]

[Redacted]

[Redacted]

[Redacted]



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Residential Street Address

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Date Resided From (MM/YYYY)

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Date Resided To (MM/YYYY)

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Residential Street Address

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Zip

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Date Resided From (MM/YYYY)

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Date Resided To (MM/YYYY)

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**Circle S Farms**

**Self**



Employer

Contact Person

Telephone

**631 South Las Vegas Blvd.**

Business Address

**Las Vegas**

**NV**

**89101**

City

State

Zip

**01/2017**

**Present**

Date Employed From (MM/YYYY)

Date Employed To (MM/YYYY)

**Eastway Holdings, LLC**

**Self**



Employer

Contact Person

Telephone

**8588 NC Highway 150 E**

Business Address

**Terrell**

**NC**

**28682**

City

State

Zip

**02/2013**

**Present**

Date Employed From (MM/YYYY)

Date Employed To (MM/YYYY)

**The Tom Company**

**Self**



Employer

Contact Person

Telephone

Business Address

**Las Vegas**

**NV**

**89109**

City

State

Zip

**01/2008**

**Present**

Date Employed From (MM/YYYY)

Date Employed To (MM/YYYY)

**U.S. Airways**

**N/A**

**N/A**

Employer

Contact Person

Telephone

Business Address

**Charlotte**

**NC**

**28105**

City

State

Zip

**02/1987**

**04/2014**

Date Employed From (MM/YYYY)

Date Employed To (MM/YYYY)

Univ. of Georgia Police Dept.

N/A

N/A

Employer

Contact Person

Telephone

University of Georgia

Business Address

Athens

GA

30601

City

State

Zip

01/1984

01/1986

Date Employed From (MM/YYYY)

Date Employed To (MM/YYYY)

Employer

Contact Person

Telephone

Business Address

City

State

Zip

Date Employed From (MM/YYYY)

Date Employed To (MM/YYYY)

Employer

Contact Person

Telephone

Business Address

City

State

Zip

Date Employed From (MM/YYYY)

Date Employed To (MM/YYYY)

Employer

Contact Person

Telephone

Business Address

City

State

Zip

Date Employed From (MM/YYYY)

Date Employed To (MM/YYYY)

FORM A: OWNERSHIP RESUME / CURRICULUM VITAE

LeBleu Fields

Business License Applicant Name

Diane Frances Reilly

Individual with Ownership Interest in Applicant

Dispensary

License Type

Individual's Ownership Percentage in Applicant

**Residential History**

*Provide all residential addresses, in reverse chronological order, for 15 years prior to date of application; attach additional form(s) if necessary.*

[Redacted residential address information]

[Redacted residential address information]

[Redacted residential address information]

[Redacted residential address information]

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Residential Street Address

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City

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State

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Date Resided From (MM/YYYY)

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Residential Street Address

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State

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Zip

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Date Resided From (MM/YYYY)

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Date Resided To (MM/YYYY)

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**Education**

*Provide all institutions of higher education attended; attach additional form(s) if necessary.*

Society of Management Accountants, now CPA Ontario	Toronto	Canada
_____ Institution	_____ City	_____ State
06/1974	06/1978	CMA, CPA
_____ Date Attended From (MM/YYYY)	_____ Date Attended To (MM/YYYY)	_____ Degree Received

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_____ Institution	_____ City	_____ State
_____ Date Attended From (MM/YYYY)	_____ Date Attended To (MM/YYYY)	_____ Degree Received

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_____ Institution	_____ City	_____ State
_____ Date Attended From (MM/YYYY)	_____ Date Attended To (MM/YYYY)	_____ Degree Received

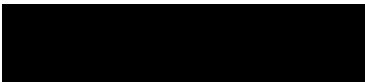
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_____ Institution	_____ City	_____ State
_____ Date Attended From (MM/YYYY)	_____ Date Attended To (MM/YYYY)	_____ Degree Received

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**Employment History**

*Provide all employers, in reverse chronological order, for 15 years prior to date of application; attach additional form(s) if necessary.*

Canopy Consulting, LLC	Self	
_____ Employer	_____ Contact Person	_____ Telephone
1500 Hwy 85 87		
_____ Business Address		
Walsenburg	CO	81089
_____ City	_____ State	_____ Zip
08/2015	Present	
_____ Date Employed From (MM/YYYY)	_____ Date Employed To (MM/YYYY)	

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**New World Olive Oil**

Employer

**2904 Selwyn Avenue**

Business Address

**Charlotte**

City

**01/2012**

Date Employed From (MM/YYYY)

**Chris Reilly**

Contact Person

**NC**

State

**12/2016**

Date Employed To (MM/YYYY)

Telephone

**Best Carolinas Properties**

Employer

**112 Middleton Place**

Business Address

**Mooresville**

City

**12/2011**

Date Employed From (MM/YYYY)

**Self**

Contact Person

**NC**

State

**12/2017**

Date Employed To (MM/YYYY)

Telephone

**Real Estate Broker**

Employer

**Mooresville**

City

**09/2006**

Date Employed From (MM/YYYY)

**Self**

Contact Person

**NC**

State

**12/2015**

Date Employed To (MM/YYYY)

Telephone

**Midgette Auto Sales, LLC**

Employer

**9022 Caratoke Hwy**

Business Address

**Harbinger**

City

**08/1993**

Date Employed From (MM/YYYY)

**Jody Midgette**

Contact Person

**NC**

State

**09/2006**

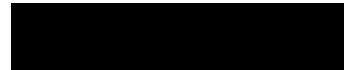
Date Employed To (MM/YYYY)

Telephone



Management Consultant

Self



Employer

Contact Person

Telephone

Self-Employed

Business Address

Toronto

Canada

City

State

Zip

04/1986

02/1993

Date Employed From (MM/YYYY)

Date Employed To (MM/YYYY)

Deskin Sales Corp.

Owner Deceased

Closed 2016

Employer

Contact Person

Telephone

155 Clayton Dr.

Business Address

Markham

Canada

L3R5T9

City

State

Zip

10/1980

04/1986

Date Employed From (MM/YYYY)

Date Employed To (MM/YYYY)

Dodge Ontario Car Co.

Bought Out

N/A

Employer

Contact Person

Telephone

Yonge St.

Business Address

Toronto

Canada

City

State

Zip

12/1978

10/1980

Date Employed From (MM/YYYY)

Date Employed To (MM/YYYY)

Employer

Contact Person

Telephone

Business Address

City

State

Zip

Date Employed From (MM/YYYY)

Date Employed To (MM/YYYY)

FORM A: OWNERSHIP RESUME / CURRICULUM VITAE

LeBleu Fields

Business License Applicant Name

Jablonski Donta Frazier

Individual with Ownership Interest in Applicant

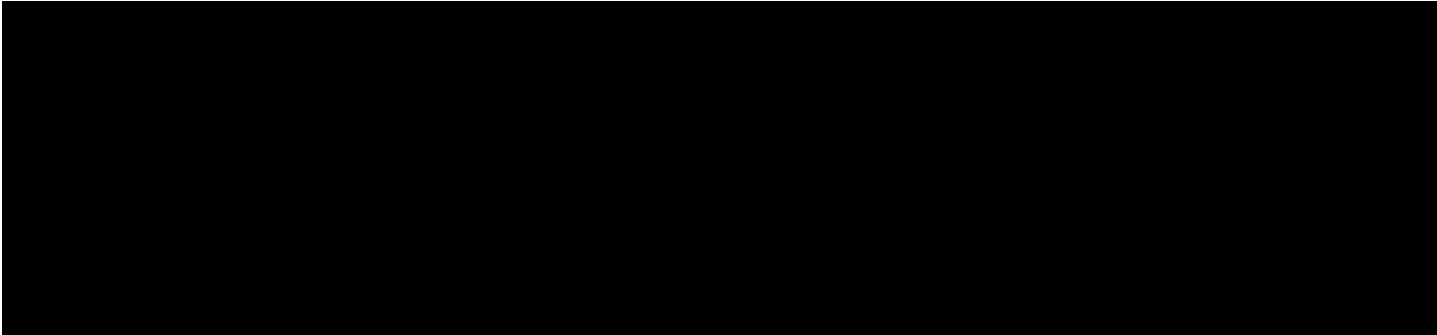
Dispensary

License Type

Individual's Ownership Percentage in Applicant

**Residential History**

*Provide all residential addresses, in reverse chronological order, for 15 years prior to date of application;*



Residential Street Address

City

State

Zip

Date Resided From (MM/YYYY)

Date Resided To (MM/YYYY).

Residential Street Address

City

State

Zip

Date Resided From (MM/YYYY)

Date Resided To (MM/YYYY)

Residential Street Address

City

State

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Date Resided From (MM/YYYY)

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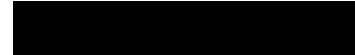
Date Resided To (MM/YYYY)

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Troy Public Works Dept.

City of Troy



Employer

Contact Person

Telephone

300 Walters St.

Business Address

Troy

AL

36081

City

State

Zip

01/2006

01/2007

Date Employed From (MM/YYYY)

Date Employed To (MM/YYYY)

Troy Bank & Trust

N/A



Employer

Contact Person

Telephone

1000 US-231

Business Address

Troy

AL

36081

City

State

Zip

02/2005

01/2006

Date Employed From (MM/YYYY)

Date Employed To (MM/YYYY)

Employer

Contact Person

Telephone

Business Address

City

State

Zip

Date Employed From (MM/YYYY)

Date Employed To (MM/YYYY)

Employer

Contact Person

Telephone

Business Address

City

State

Zip

Date Employed From (MM/YYYY)

Date Employed To (MM/YYYY)

---

Employer	Contact Person	Telephone
----------	----------------	-----------

---

Business Address

---

City	State	Zip
------	-------	-----

---

Date Employed From (MM/YYYY)	Date Employed To (MM/YYYY)
------------------------------	----------------------------

---

---

Employer	Contact Person	Telephone
----------	----------------	-----------

---

Business Address

---

City	State	Zip
------	-------	-----

---

Date Employed From (MM/YYYY)	Date Employed To (MM/YYYY)
------------------------------	----------------------------

---

---

Employer	Contact Person	Telephone
----------	----------------	-----------

---

Business Address

---

City	State	Zip
------	-------	-----

---

Date Employed From (MM/YYYY)	Date Employed To (MM/YYYY)
------------------------------	----------------------------

---

---

Employer	Contact Person	Telephone
----------	----------------	-----------

---

Business Address

---

City	State	Zip
------	-------	-----

---

Date Employed From (MM/YYYY)	Date Employed To (MM/YYYY)
------------------------------	----------------------------

---

FORM A: OWNERSHIP RESUME / CURRICULUM VITAE

LeBleu Fields

Business License Applicant Name

Rory Lamont Murphy

Individual with Ownership Interest in Applicant

Dispensary

License Type

Individual's Ownership Percentage in Applicant

**Residential History**

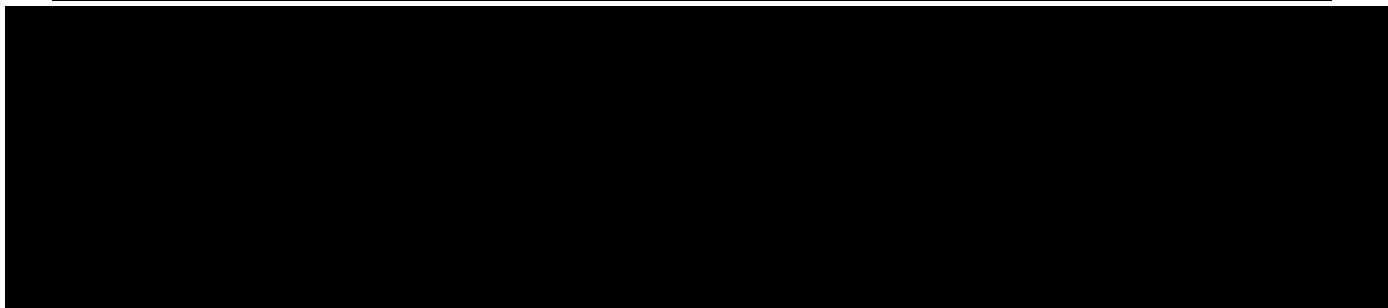
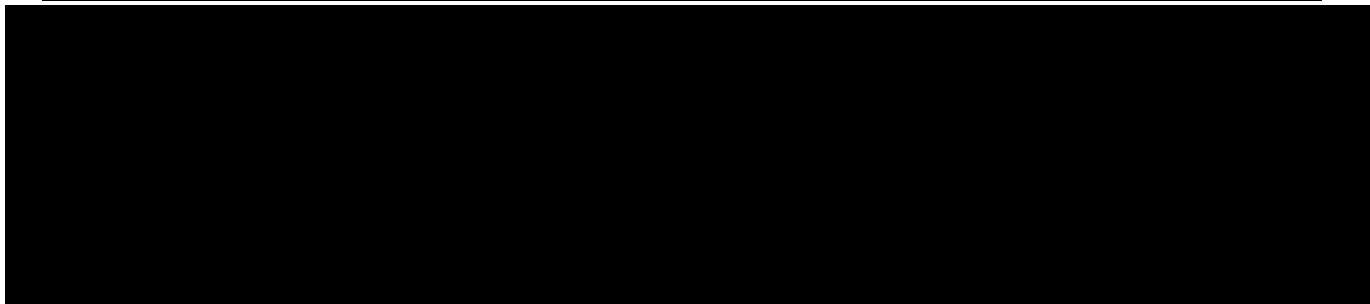
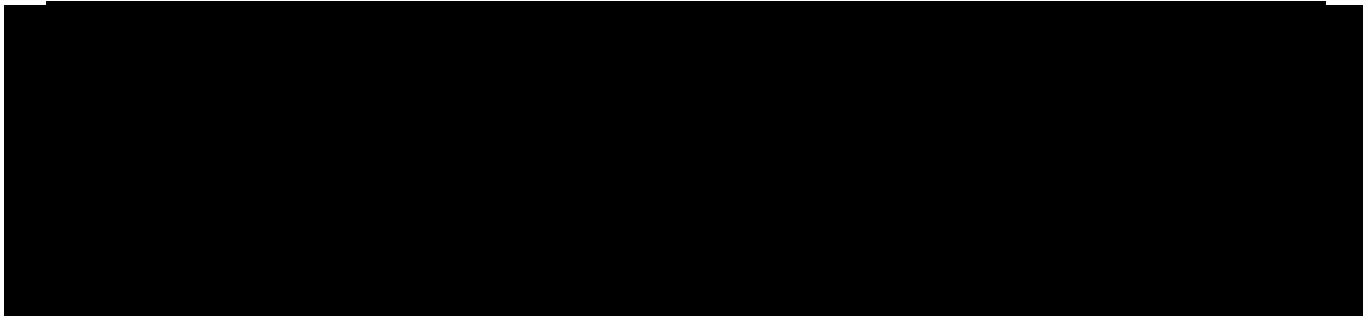
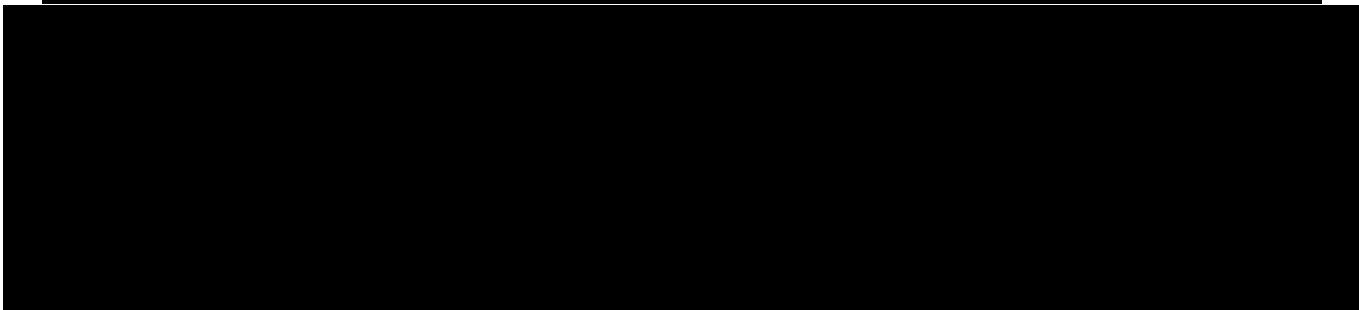
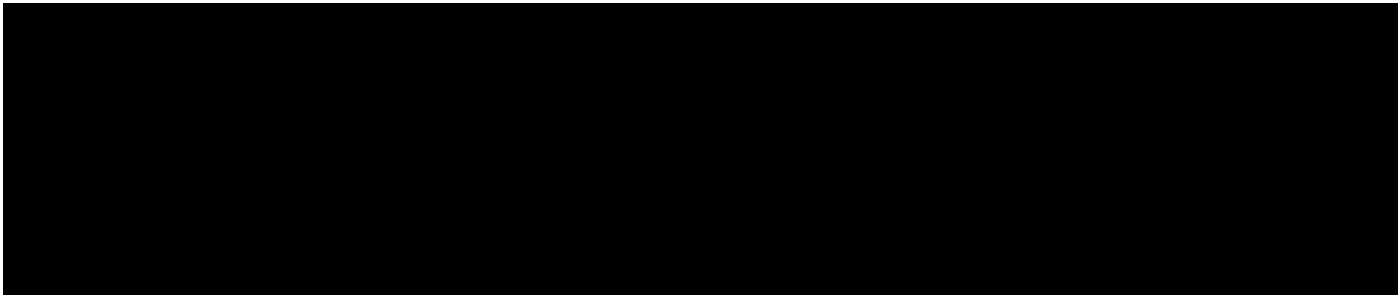
*Provide all residential addresses, in reverse chronological order, for 15 years prior to date of application;*

[Redacted]

[Redacted]

[Redacted]

[Redacted]







Beverages and More (Bevmo)

Gary

Employer

Contact Person

Telephone

19201 Golden Valley Rd.

Business Address

Santa Clarita

CA

91387

City

State

Zip

03/2015

05/2016

Date Employed From (MM/YYYY)

Date Employed To (MM/YYYY)

Nutrition Rush

N/A

Employer

Contact Person

Telephone

35 S Stephanie St.

Business Address

Henderson

NV

89012

City

State

Zip

09/2013

03/2015

Date Employed From (MM/YYYY)

Date Employed To (MM/YYYY)

Chart House

David

Employer

Contact Person

Telephone

2588 S Coast Hwy 101

Business Address

Cardiff

CA

92007

City

State

Zip

02/2011

07/2013

Date Employed From (MM/YYYY)

Date Employed To (MM/YYYY)

Joes Crab Shack

Paul

N/A

Employer

Contact Person

Telephone

1991 N. Rainbow Blvd

Business Address

Las Vegas

NV

89108

City

State

Zip

01/2008

01/2011

Date Employed From (MM/YYYY)

Date Employed To (MM/YYYY)

Allied North America

N/A

Bought out (AON)

Employer

Contact Person

Telephone

3495 Piedmont Rd. NE

Business Address

Atlanta

GA

30305

City

State

Zip

03/2005

12/2007

Date Employed From (MM/YYYY)

Date Employed To (MM/YYYY)

Employer

Contact Person

Telephone

Business Address

City

State

Zip

Date Employed From (MM/YYYY)

Date Employed To (MM/YYYY)

Employer

Contact Person

Telephone

Business Address

City

State

Zip

Date Employed From (MM/YYYY)

Date Employed To (MM/YYYY)

Employer

Contact Person

Telephone

Business Address

City

State

Zip

Date Employed From (MM/YYYY)

Date Employed To (MM/YYYY)



P.O. Box 967  
Troy, Alabama 36081

DETACH AT THE PERFORATION AND MAIL WITH PAYMENT  Check if there is address change on reverse side.

PAST DUE PAYMENT(S)	UNPAID LATE CHARGES AND FEES	CURRENT PAYMENT	TOTAL PAYMENT DUE
.00	.00		
PAYMENT DUE DATE	PAYMENT MUST REACH US BY	OTHERWISE PLEASE ADD LATE CHARGE OF	TOTAL PAYMENT DUE INCLUDING LATE CHARGE
12/25/22	1/04/23	28.63	
			ADDITIONAL ESCROW
			ADDITIONAL PRINCIPAL
			OTHER <small>(please explain at top)</small>
			TOTAL ENCLOSED

JABLONSKI DONTA FRAZIER  
1796 BUTTER & EGG ROAD  
TROY AL 36081

5075 103 1: 040 1067300

December 30, 2022 09:20 AM

**Member Account Summary**  
South Alabama Electric Cooperative

Member Name/Address:



Account #	Primary	Type	Created	Service Address	Status	Billed Balance	Balance	Last Billed	Prepaid Balance	Cr Grade	Deposit	YTD Patronage	>30 Days	>60 Days	>90 Days
608904501	Y	Electric	Jun 26, 1986	[REDACTED]	Active	0.00	0.00	Dec 07, 2022	0.00	C	390.00	2,776.19	0	0	0

Member's Billed Balance      0.00      Member's >30      0.00      Member's Prepaid Balance      0.00  
Member's Balance      0.00      Member's >60      0.00  
Member's Deposit Payable Balance      390.00      Member's >90      0.00

[Redacted]

[Redacted]

Attention: Dorita Frazier

SSN Not Assigned Member Since Jun 26, 1986 Business X

Hold Membership Fee X Membership Fee on Hand \$0.00 Ethic Code Not Assigned Language Preference English

Primary

Cellular Email [Redacted]

Active Balance \$0.00

Address Is Valid

Contacts

+ CONTACT								
Name	Contact Type	Address	SSN	Date of B	Business	Driver's License	State	Attention
Frazier, Dorita	Primary Contact	1797 Butler and Egg Road Troy, MI 48068			X			Dorita Frazier

1 10 items per page 1 of 1 items



**Mike Shelton, Agent**

1009 Hwy 231 South, Suite B  
Troy, AL 36081-3085  
Bus 334-566-3486  
mike@mikesheltonagency.com

FRAZIER, JABLONSKI DONTA  
1797 BUTTER AND EGG RD  
TROY AL 36081-4456



11 NISSAN MAXIMA 4DR  
VIN: 1N4AA5AP6BC857103

STATUS:SFPP      DUE DATE: JUN-08-23  
AMT DUE:SFPP      OXD:JUN-08-99

TOT PREM:  
463.14  
PREV PREM:  
455.54


A	25	/50	/25	126.97	RI	80% /1000	14.82
C5000				16.96	U	25 /50	36.49
D500				133.72			
G500				127.68			
H				6.50			

SFPP ACCT: 0223-0801-09

AUTO POLICY HAS BEEN ACTIVE WITH STATE FARM SINCE JUNE 8, 1999



**Central Alabama  
Electric Cooperative**

A Touchstone Energy Cooperative 

1802 Hwy 31 North, Prattville, Alabama 36067  
P.O. Box 681570, Prattville, Alabama 36068  
Telephone: (334) 365-6762, (800) 545-5735  
Fax: (334) 365-6148  
[www.caec.coop](http://www.caec.coop)

Date: **December 28, 2022**

Member's Name: **John M Dix  
Aretha B Dix**

Account Number: 

Service Address: **203 Hidden Valley Rd  
Deatsville, AL 36022**

Beginning Service: **June 25, 2001- January 14, 2008**

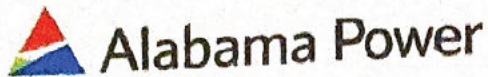
Thank you for allowing us to assist you.

Sincerely,

*Ashley Baker*

Ashley Baker  
Customer Service Representative  
1-800-545-5735  
334-365-6762





P. O. Box 2641  
Birmingham, AL 35291-0024

Tel: 1-800-245-2244

12/28/2022

Aretha Q Dix  
2654 CAPSTONE CT MONTGOMERY AL 36106



To Whom It May Concern:

The following information is being provided from our records as requested:

Alabama Power provided electric service to:

Aretha Q Dix  
2654 CAPSTONE CT MONTGOMERY, AL 36106  
From: 6/7/2011 To: Present

Sincerely,

Customer Service  
Alabama Power

## 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.

*Rory Murphy*

Printed Name of Verifying Individual

*OWNER*

Title of Verifying Individual

*[Handwritten Signature]*

Signature of Verifying Individual

*02-27-2023*

Verification Date

**FORM E: BACKGROUND CHECK INDIVIDUAL VERIFICATION**

*Each individual identified by § 20-2A-55(b), Code of Alabama 1975 (as amended) (i.e., each owner, shareholder, director, board member, and individual with an economic interest in the Applicant) must complete a separate form.*

Le Bleu Fields

Dispensary

Business License Applicant Name

License Type

Jablonski Frazier

Individual's Name

Individual's Role (select all that apply):  Owner  Shareholder  Director  Board Member  
 Individual with Economic Interest in Applicant

**Verification**

The undersigned, as identified above, hereby verifies all of the following:

- That the individual's role(s) in the Applicant's business is one or more of the roles identified by § 20-2A-55(b), Code of Alabama 1975 (as amended).
- That the individual shall, as required by § 20-2A-55(b), Code of Alabama 1975 (as amended), submit to a state and national criminal background check, to be conducted and/or coordinated by the Alabama Law Enforcement Agency.
- That the individual has submitted its completed state criminal background check application form (ALEA SBI Form 46), and all other items required therewith, to ALEA
- That the individual has submitted its national criminal background check form (FBI Identity History Summary Request Form), and all other items required therewith, to the FBI.
- That the individual, on his/her state and national background check forms, has authorized ALEA and the FBI, as applicable, to release any and all criminal history information of the individual to the Alabama Medical Cannabis Commission.
- That the individual will promptly respond to any request from ALEA, the FBI, and/or the Alabama Medical Cannabis Commission regarding the processing of the individual's state and national criminal background checks.
- That the individual has confirmed that his/her name and role(s) have been included, by the Applicant, on the Background Check Applicant Verification Form.

*Yvetha D. Blount-Dip*  
Signature of Verifying Individual

*28 Dec 2022*  
Verification Date



**FORM E: BACKGROUND CHECK INDIVIDUAL VERIFICATION**

Each individual identified by § 20-2A-55(b), Code of Alabama 1975 (as amended) (i.e., each owner, shareholder, director, board member, and individual with an economic interest in the Applicant) must complete a separate form.

Le Bleu Fields

Dispensary

Business License Applicant Name

License Type

Diane Reilly

Individual's Name

Individual's Role (select all that apply):  Owner  Shareholder  Director  Board Member  
 Individual with Economic Interest in Applicant

**Verification**

The undersigned, as identified above, hereby verifies all of the following:

- That the individual's role(s) in the Applicant's business is one or more of the roles identified by § 20-2A-55(b), Code of Alabama 1975 (as amended).
- That the individual shall, as required by § 20-2A-55(b), Code of Alabama 1975 (as amended), submit to a state and national criminal background check, to be conducted and/or coordinated by the Alabama Law Enforcement Agency.
- That the individual has submitted its completed state criminal background check application form (ALEA SBI Form 46), and all other items required therewith, to ALEA
- That the individual has submitted its national criminal background check form (FBI Identity History Summary Request Form), and all other items required therewith, to the FBI.
- That the individual, on his/her state and national background check forms, has authorized ALEA and the FBI, as applicable, to release any and all criminal history information of the individual to the Alabama Medical Cannabis Commission.
- That the individual will promptly respond to any request from ALEA, the FBI, and/or the Alabama Medical Cannabis Commission regarding the processing of the individual's state and national criminal background checks.
- That the individual has confirmed that his/her name and role(s) have been included, by the Applicant, on the Background Check Applicant Verification Form.

*Diane Reilly*  
Signature of Verifying Individual

28 Dec 2022  
Verification Date

**FORM E: BACKGROUND CHECK INDIVIDUAL VERIFICATION**

Each individual identified by § 20-2A-55(b), Code of Alabama 1975 (as amended) (i.e., each owner, shareholder, director, board member, and individual with an economic interest in the Applicant) must complete a separate form.

Le Bleu Fields

Business License Applicant Name

Aretha Dix

Individual's Name

Dispensary

License Type

Individual's Role (select all that apply):  Owner  Shareholder  Director  Board Member  
 Individual with Economic Interest in Applicant

**Verification**

The undersigned, as identified above, hereby verifies all of the following:

- That the individual's role(s) in the Applicant's business is one or more of the roles identified by § 20-2A-55(b), Code of Alabama 1975 (as amended).
- That the individual shall, as required by § 20-2A-55(b), Code of Alabama 1975 (as amended), submit to a state and national criminal background check, to be conducted and/or coordinated by the Alabama Law Enforcement Agency.
- That the individual has submitted its completed state criminal background check application form (ALEA SBI Form 46), and all other items required therewith, to ALEA
- That the individual has submitted its national criminal background check form (FBI Identity History Summary Request Form), and all other items required therewith, to the FBI.
- That the individual, on his/her state and national background check forms, has authorized ALEA and the FBI, as applicable, to release any and all criminal history information of the individual to the Alabama Medical Cannabis Commission.
- That the individual will promptly respond to any request from ALEA, the FBI, and/or the Alabama Medical Cannabis Commission regarding the processing of the individual's state and national criminal background checks.
- That the individual has confirmed that his/her name and role(s) have been included, by the Applicant, on the Background Check Applicant Verification Form.

Aretha J. Brown-Dix

Signature of Verifying Individual

28 Dec 2022

Verification Date



**FORM E: BACKGROUND CHECK INDIVIDUAL VERIFICATION**

Each individual identified by § 20-2A-55(b), Code of Alabama 1975 (as amended) (i.e., each owner, shareholder, director, board member, and individual with an economic interest in the Applicant) must complete a separate form.

Le Bleu Fields

Business License Applicant Name

Brenda Gunsallus

Individual's Name

Dispensary

License Type

Individual's Role (select all that apply):  Owner  Shareholder  Director  Board Member  
 Individual with Economic Interest in Applicant

**Verification**

The undersigned, as identified above, hereby verifies all of the following:

- That the individual's role(s) in the Applicant's business is one or more of the roles identified by § 20-2A-55(b), Code of Alabama 1975 (as amended).
- That the individual shall, as required by § 20-2A-55(b), Code of Alabama 1975 (as amended), submit to a state and national criminal background check, to be conducted and/or coordinated by the Alabama Law Enforcement Agency.
- That the individual has submitted its completed state criminal background check application form (ALEA SBI Form 46), and all other items required therewith, to ALEA
- That the individual has submitted its national criminal background check form (FBI Identity History Summary Request Form), and all other items required therewith, to the FBI.
- That the individual, on his/her state and national background check forms, has authorized ALEA and the FBI, as applicable, to release any and all criminal history information of the individual to the Alabama Medical Cannabis Commission.
- That the individual will promptly respond to any request from ALEA, the FBI, and/or the Alabama Medical Cannabis Commission regarding the processing of the individual's state and national criminal background checks.
- That the individual has confirmed that his/her name and role(s) have been included, by the Applicant, on the Background Check Applicant Verification Form.

Yvetha J. Brown-DuP  
Signature of Verifying Individual

08 Dec 2022  
Verification Date

**FORM E: BACKGROUND CHECK INDIVIDUAL VERIFICATION**

Each individual identified by § 20-2A-55(b), Code of Alabama 1975 (as amended) (i.e., each owner, shareholder, director, board member, and individual with an economic interest in the Applicant) must complete a separate form.

Le Bleu Fields

Business License Applicant Name

Dispensary

License Type

Darlene Davis

Individual's Name

Individual's Role (select all that apply):  Owner  Shareholder  Director  Board Member  
 Individual with Economic Interest in Applicant

**Verification**

The undersigned, as identified above, hereby verifies all of the following:

- That the individual's role(s) in the Applicant's business is one or more of the roles identified by § 20-2A-55(b), Code of Alabama 1975 (as amended).
- That the individual shall, as required by § 20-2A-55(b), Code of Alabama 1975 (as amended), submit to a state and national criminal background check, to be conducted and/or coordinated by the Alabama Law Enforcement Agency.
- That the individual has submitted its completed state criminal background check application form (ALEA SBI Form 46), and all other items required therewith, to ALEA
- That the individual has submitted its national criminal background check form (FBI Identity History Summary Request Form), and all other items required therewith, to the FBI.
- That the individual, on his/her state and national background check forms, has authorized ALEA and the FBI, as applicable, to release any and all criminal history information of the individual to the Alabama Medical Cannabis Commission.
- That the individual will promptly respond to any request from ALEA, the FBI, and/or the Alabama Medical Cannabis Commission regarding the processing of the individual's state and national criminal background checks.
- That the individual has confirmed that his/her name and role(s) have been included, by the Applicant, on the Background Check Applicant Verification Form.

*Darlene Q. Brown-Owens*  
Signature of Verifying Individual

*28 Dec 2022*  
Verification Date



FORM E: BACKGROUND CHECK INDIVIDUAL VERIFICATION

Each individual identified by § 20-2A-55(b), Code of Alabama 1975 (as amended) (i.e., each owner, shareholder, director, board member, and individual with an economic interest in the Applicant) must complete a separate form.

Le Bleu Fields

Business License Applicant Name

Dispensary

License Type

Rory Murphy

Individual's Name

Individual's Role (select all that apply):  Owner  Shareholder  Director  Board Member  Individual with Economic Interest in Applicant

Verification

The undersigned, as identified above, hereby verifies all of the following:

- That the individual's role(s) in the Applicant's business is one or more of the roles identified by § 20-2A-55(b), Code of Alabama 1975 (as amended).
• That the individual shall, as required by § 20-2A-55(b), Code of Alabama 1975 (as amended), submit to a state and national criminal background check, to be conducted and/or coordinated by the Alabama Law Enforcement Agency.
• That the individual has submitted its completed state criminal background check application form (ALEA SBI Form 46), and all other items required therewith, to ALEA
• That the individual has submitted its national criminal background check form (FBI Identity History Summary Request Form), and all other items required therewith, to the FBI.
• That the individual, on his/her state and national background check forms, has authorized ALEA and the FBI, as applicable, to release any and all criminal history information of the individual to the Alabama Medical Cannabis Commission.
• That the individual will promptly respond to any request from ALEA, the FBI, and/or the Alabama Medical Cannabis Commission regarding the processing of the individual's state and national criminal background checks.
• That the individual has confirmed that his/her name and role(s) have been included, by the Applicant, on the Background Check Applicant Verification Form.

Yvonne O. Brown, DPO
Signature of Verifying Individual

28 Dec 2020
Verification Date



**FORM B: BACKGROUND CHECK APPLICANT VERIFICATION**

Le Bleu Fields

Dispensary

Business License Applicant Name

License Type

Provide the name and title of each individual identified by § 20-2A-55(b), Code of Alabama 1975 (as amended) (i.e., each owner, shareholder, director, board member, and individual with an economic interest in the Applicant). Attach additional forms if necessary.

NAME	ROLE (select all that apply)
Jablonski Frazier	<input checked="" type="checkbox"/> Owner <input type="checkbox"/> Shareholder <input type="checkbox"/> Director <input type="checkbox"/> Board Member <input type="checkbox"/> Individual with Economic Interest in Applicant
Aretha Dix	<input checked="" type="checkbox"/> Owner <input type="checkbox"/> Shareholder <input type="checkbox"/> Director <input type="checkbox"/> Board Member <input type="checkbox"/> Individual with Economic Interest in Applicant
Brenda Gunsallus	<input checked="" type="checkbox"/> Owner <input type="checkbox"/> Shareholder <input type="checkbox"/> Director <input type="checkbox"/> Board Member <input type="checkbox"/> Individual with Economic Interest in Applicant
Darlene Davis	<input checked="" type="checkbox"/> Owner <input type="checkbox"/> Shareholder <input type="checkbox"/> Director <input type="checkbox"/> Board Member <input type="checkbox"/> Individual with Economic Interest in Applicant
Diane Reilly	<input checked="" type="checkbox"/> Owner <input type="checkbox"/> Shareholder <input type="checkbox"/> Director <input type="checkbox"/> Board Member <input type="checkbox"/> Individual with Economic Interest in Applicant
Rory Murphy	<input checked="" type="checkbox"/> Owner <input type="checkbox"/> Shareholder <input type="checkbox"/> Director <input type="checkbox"/> Board Member <input type="checkbox"/> Individual with Economic Interest in Applicant
	<input type="checkbox"/> Owner <input type="checkbox"/> Shareholder <input type="checkbox"/> Director <input type="checkbox"/> Board Member <input type="checkbox"/> Individual with Economic Interest in Applicant
	<input type="checkbox"/> Owner <input type="checkbox"/> Shareholder <input type="checkbox"/> Director <input type="checkbox"/> Board Member <input type="checkbox"/> Individual with Economic Interest in Applicant
	<input type="checkbox"/> Owner <input type="checkbox"/> Shareholder <input type="checkbox"/> Director <input type="checkbox"/> Board Member <input type="checkbox"/> Individual with Economic Interest in Applicant
	<input type="checkbox"/> Owner <input type="checkbox"/> Shareholder <input type="checkbox"/> Director <input type="checkbox"/> Board Member <input type="checkbox"/> Individual with Economic Interest in Applicant
	<input type="checkbox"/> Owner <input type="checkbox"/> Shareholder <input type="checkbox"/> Director <input type="checkbox"/> Board Member <input type="checkbox"/> Individual with Economic Interest in Applicant

**Applicant Verification:** The undersigned hereby verifies that the individuals listed hereinabove (and attached, as necessary) are all of the individuals identified by § 20-2A-55(b), Code of Alabama 1975 (as amended) with respect to the Applicant. The undersigned further verifies that each individual listed hereinabove (and attached, as necessary) has requested a state criminal background check from the Alabama Law Enforcement Agency (ALEA) and a national criminal background check from the FBI.

Aretha Dix  
 Printed Name of Verifying Individual

OWNER  
 Title of Verifying Individual

Aretha D. Brown-Dix  
 Signature of Verifying Individual

28 Dec 2022  
 Verification Date



**U.S. Department of Justice**  
 Federal Bureau of Investigation  
 Criminal Justice Information Services Division  
 Clarksburg, WV 26306

JABLONSKI DONTA FRAZIER  
 1797 BUTTER AND EGG RD  
 TROY, AL 36081

Date: 12-28-2022

The Criminal Justice Information Services (CJIS) Division of the Federal Bureau of Investigation (FBI) has completed the following fingerprint submission:

**Subject Name**

JABLONSKI DONTA FRAZIER

**Search Completed Result**

12-28-2022 E2022362000000215905

**A SEARCH OF THE FINGERPRINTS PROVIDED BY THIS INDIVIDUAL HAS REVEALED NO PRIOR ARREST DATA AT THE FBI. THIS DOES NOT PRECLUDE FURTHER CRIMINAL HISTORY AT THE STATE OR LOCAL LEVEL.**

Social Security number: XXX-XX-7760

The result of the above response is only effective for the date the submission was originally completed. For more updated information, please submit new fingerprints of the Subject.

In order to protect Personally Identifiable Information, as of August 17, 2009, FBI policy has changed to no longer return the fingerprint cards. This form will serve as the FBI's official response.

This Identity History Summary (IdHS) is provided pursuant to 28 CFR 16.30-16.34 solely for you to conduct a personal review and/or obtain a change, correction, or updating of your record. **This IdHS is not provided for the purpose of licensing or employment or any other purpose enumerated in 28 CFR 20.33.**

Any questions may be addressed to the Customer Service Group at 304-625-5590. You may also visit the website at [www.fbi.gov/checks](http://www.fbi.gov/checks) for further instructions.

Kimberly J. Del Greco  
 Deputy Assistant Director  
 Information Services Branch  
 Criminal Justice Information  
 Services Division



**U.S. Department of Justice**Federal Bureau of Investigation  
Criminal Justice Information Services Division  
Clarksburg, WV 26306ARETHA QUINTINA DIX  
2654 CAPSTONE DR  
MONTGOMERY, AL 36106

Date: 12-28-2022

The Criminal Justice Information Services (CJIS) Division of the Federal Bureau of Investigation (FBI) has completed the following fingerprint submission:

**Subject Name**

ARETHA QUINTINA DIX

**Search Completed Result**

12-28-2022 E2022362000000118623

**A SEARCH OF THE FINGERPRINTS PROVIDED BY THIS INDIVIDUAL HAS REVEALED NO PRIOR ARREST DATA AT THE FBI. THIS DOES NOT PRECLUDE FURTHER CRIMINAL HISTORY AT THE STATE OR LOCAL LEVEL.**

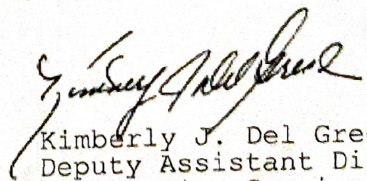
Social Security number: XXX-XX-8062

The result of the above response is only effective for the date the submission was originally completed. For more updated information, please submit new fingerprints of the Subject.

In order to protect Personally Identifiable Information, as of August 17, 2009, FBI policy has changed to no longer return the fingerprint cards. This form will serve as the FBI's official response.

This Identity History Summary (IdHS) is provided pursuant to 28 CFR 16.30-16.34 solely for you to conduct a personal review and/or obtain a change, correction, or updating of your record. **This IdHS is not provided for the purpose of licensing or employment or any other purpose enumerated in 28 CFR 20.33.**

Any questions may be addressed to the Customer Service Group at 304-625-5590. You may also visit the website at [www.fbi.gov/checks](http://www.fbi.gov/checks) for further instructions.



Kimberly J. Del Greco  
Deputy Assistant Director  
Information Services Branch  
Criminal Justice Information  
Services Division



## 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.

*Aretha Dix*  
Printed Name of Verifying Individual

*Owner*  
Title of Verifying Individual

*Aretha Q. Brown-Dix*  
Signature of Verifying Individual

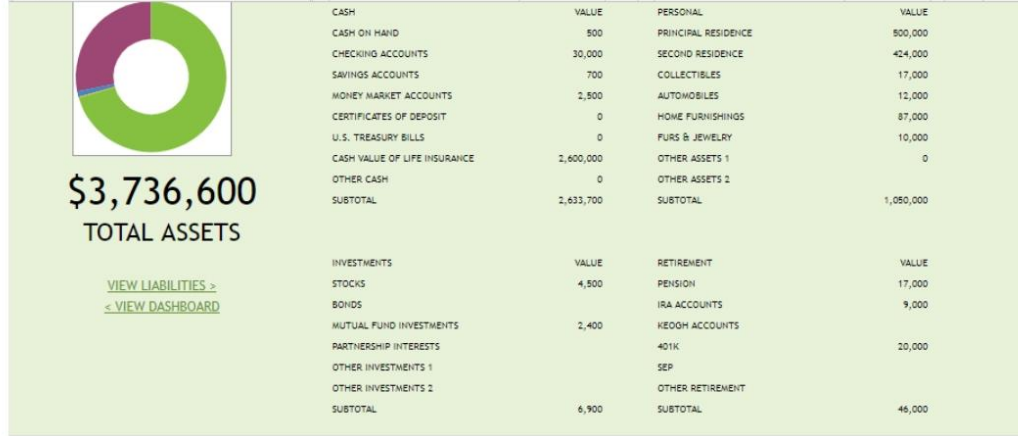
*28 Dec 2022*  
Verification Date



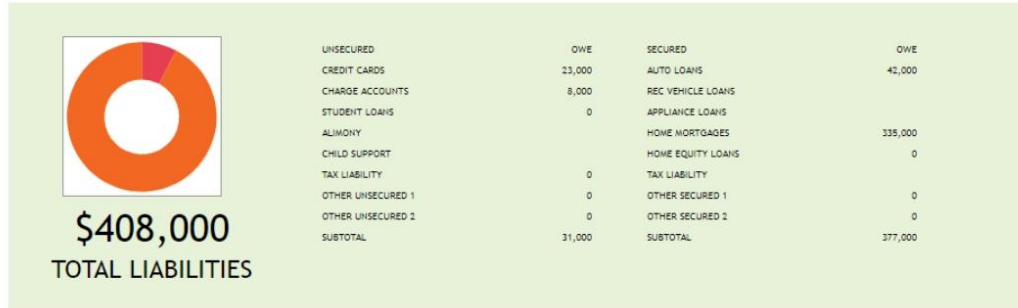
TURNER & ASSOCIATES

19 Inverness Center Parkway, Ste. 200  
 Hoover, AL 35242  
 205.994.6398  
 www.turnerassociates.business

Assets:



Liabilities:



[REDACTED]

**STATEMENT OF FINANCIAL CONDITION**

**DECEMBER 28, 2022**

**Assets:**

Cash	\$ 411,000	
Investment, retirement savings (Note 2)	30,000	
Investment in entities (Note 3)	9,693,000	
Investment, real estate properties (Note 4)	545,000	
Personal residence (Note 5)	343,000	
Personal property and vehicles (Note 6)	13,000	
Furniture and appliances (Note 6)	<u>13,000</u>	
<b>Total assets</b>		<b><u>\$ 11,048,000</u></b>

**Liabilities:**

Note payable, personal residence (Note 5)	\$ 190,000	
Income taxes payable - 2021	<u>505,000</u>	
<b>Total liabilities</b>		<b>\$ 695,000</b>

**Net Worth** 10,353,000

**Total Liabilities and Net Worth** **\$ 11,048,000**

*See accompanying accountant's compilation report and notes to financial statement.*

[REDACTED]

**STATEMENT OF FINANCIAL CONDITION**

**DECEMBER 28, 2022**

**Assets:**

Cash	\$ 165,000
Investment in entities (Note 2)	7,724,000
Investment, real estate properties (Note 3)	270,000
Furniture and appliances (Note 4)	13,000
Personal property and vehicles (Note 4)	14,000
Vehicle (Note 5)	<u>68,000</u>

**Total assets** \$ 8,254,000

**Liabilities:**

Note payable, vehicle (Note 5)	\$ 30,000
Income taxes payable – 2021	370,000
Note payable, credit cards (Note 6)	<u>10,000</u>

**Total liabilities** \$ 410,000

**Net Worth** 7,844,000

**Total Liabilities and Net Worth** \$ 8,254,000

[REDACTED]

## NOTES TO COMPILED PERSONAL FINANCIAL STATEMENT

### NOTE 1 - GENERAL

In the determination of net assets, all major assets owned by [REDACTED] and all major liabilities are included in the accompanying statement of financial condition. Minor personal effects and normal unpaid bills and accruals, which have an immaterial effect on net worth are not included in this report. Assets are stated at their estimated current values and liabilities at their estimated current amounts.

### NOTE 2 - INVESTMENT IN ENTITIES

[REDACTED] owns 50% of [REDACTED] 25% of [REDACTED] 14.74% of [REDACTED] 25% of Circle S dba [REDACTED] and 10.50% of [REDACTED]. [REDACTED] has valued her investments in the entities at \$7,724,000 based upon her knowledge of the entities at December 28, 2022.

### NOTE 3 - INVESTMENT IN REAL ESTATE

[REDACTED] owns multiple real estate investment homes in North Carolina and Florida which she has valued at a total of \$270,000 based on comparable sales.

### NOTE 4 - PERSONAL PROPERTY, FURNITURE AND RECREATIONAL VEHICLES

[REDACTED] owns personal property which she has have valued at \$13,000, furniture and appliances which she has valued at \$13,000, and a recreational vehicle which she has valued at \$1,000.

### NOTE 5 - VEHICLE AND RELATED NOTE PAYABLE

[REDACTED] owns a 2022 Chevy Tahoe which she has valued at \$68,000 based on comparable sales. This vehicle is secured by a note payable to GM Financial requiring monthly payments of \$792, inclusive of taxes annually through February 2026. The balance on the note was approximately \$30,000 as of December 28, 2022.

### NOTE 6 - NOTE PAYABLE, CREDIT CARDS

[REDACTED] has one credit card with the North Carolina State Employee Credit Union. The credit card has a balance of approximately \$10,000. The credit card has a monthly payment of \$255 and an interest rate of 11.50%.

### NOTE 7 - SUBSEQUENT EVENTS

[REDACTED] has evaluated subsequent events through December 29, 2022, which is the date the financial statements were available to be issued.



## 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.

*Aretha Dix*

Printed Name of Verifying Individual

*owner*

Title of Verifying Individual

*Aretha Q. Brown-Dix*

Signature of Verifying Individual

*28 Dec 2022*

Verification Date

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Cash Basis



**Balance Sheet**  
As of December 31, 2023

	<u>Dec 31, 23</u>
<b>ASSETS</b>	
<b>Current Assets</b>	
Checking/Savings	
10000 · Cash & Bank	
1001 · Bank - Cash in Vault	366,300.00
<b>Total 10000 · Cash &amp; Bank</b>	<u>366,300.00</u>
<b>Total Checking/Savings</b>	<u>366,300.00</u>
<b>Total Current Assets</b>	366,300.00
<b>Fixed Assets</b>	
17000 · Leasehold Improvements	
1701 · Leasehold Improvements	100,000.00
<b>Total 17000 · Leasehold Improvements</b>	<u>100,000.00</u>
<b>Total Fixed Assets</b>	100,000.00
<b>Other Assets</b>	
18000 · Licenses	
1810 · Licenses	40,000.00
<b>Total 18000 · Licenses</b>	40,000.00
19000 · Other Assets	
1901 · Security Deposit - Rent	5,000.00
1960 · Prepaid Insurance	2,000.00
<b>Total 19000 · Other Assets</b>	<u>7,000.00</u>
<b>Total Other Assets</b>	<u>47,000.00</u>
<b>TOTAL ASSETS</b>	<u><u>513,300.00</u></u>

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Cash Basis



**Balance Sheet**  
As of December 31, 2023

	<u>Dec 31, 23</u>
<b>LIABILITIES &amp; EQUITY</b>	
<b>Equity</b>	
30000 · Opening Balance Equity	
30100 · Member 1 Contribution	65,000.00
30200 · Member 2 Contribution	105,000.00
30300 · Member 3 Contribution	105,000.00
30400 · Member 4 Contribution	90,000.00
30500 · Member 5 Contribution	90,000.00
30600 · Member 6 Contribution	90,000.00
	<hr/>
<b>Total 30000 · Opening Balance Equity</b>	545,000.00
<b>Net Income</b>	-31,700.00
	<hr/>
<b>Total Equity</b>	513,300.00
	<hr/>
<b>TOTAL LIABILITIES &amp; EQUITY</b>	<b>513,300.00</b>
	<hr/> <hr/>

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Cash Basis



**Balance Sheet**  
As of December 31, 2024

	<u>Dec 31, 24</u>
<b>ASSETS</b>	
<b>Current Assets</b>	
<b>Checking/Savings</b>	
10000 · Cash & Bank	
1001 · Bank - Cash in Vault	40,375.00
<b>Total 10000 · Cash &amp; Bank</b>	<u>40,375.00</u>
<b>Total Checking/Savings</b>	<u>40,375.00</u>
<b>Total Current Assets</b>	40,375.00
<b>Fixed Assets</b>	
<b>15000 · Furniture and Equipment</b>	
1501 · Furniture & Fixtures	10,000.00
1520 · Computers, POS Equipment	7,000.00
1550 · Security Equipment	<u>15,000.00</u>
<b>Total 15000 · Furniture and Equipment</b>	32,000.00
<b>17000 · Leasehold Improvements</b>	
1701 · Leasehold Improvements	<u>100,000.00</u>
<b>Total 17000 · Leasehold Improvements</b>	<u>100,000.00</u>
<b>Total Fixed Assets</b>	132,000.00
<b>Other Assets</b>	
<b>18000 · Licenses</b>	
1810 · Licenses	<u>40,000.00</u>
<b>Total 18000 · Licenses</b>	40,000.00

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Cash Basis



**Balance Sheet**  
As of December 31, 2024

	<u>Dec 31, 24</u>
<b>19000 · Other Assets</b>	
1901 · Security Deposit - Rent	5,000.00
1960 · Prepaid Insurance	<u>2,000.00</u>
<b>Total 19000 · Other Assets</b>	<u>7,000.00</u>
<b>Total Other Assets</b>	<u>47,000.00</u>
<b>TOTAL ASSETS</b>	<u><u>219,375.00</u></u>
<b>LIABILITIES &amp; EQUITY</b>	
<b>Equity</b>	
30000 · Opening Balance Equity	
30100 · Member 1 Contribution	65,000.00
30200 · Member 2 Contribution	105,000.00
30300 · Member 3 Contribution	105,000.00
30400 · Member 4 Contribution	90,000.00
30500 · Member 5 Contribution	90,000.00
30600 · Member 6 Contribution	<u>90,000.00</u>
<b>Total 30000 · Opening Balance Equity</b>	545,000.00
32000 · Retained Earnings	-31,700.00
Net Income	<u>-293,925.00</u>
<b>Total Equity</b>	<u>219,375.00</u>
<b>TOTAL LIABILITIES &amp; EQUITY</b>	<u><u>219,375.00</u></u>

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Cash Basis



**Balance Sheet**  
As of December 31, 2025

	Dec 31, 25
<b>ASSETS</b>	
Current Assets	
Checking/Savings	
10000 · Cash & Bank	
1001 · Bank - Cash in Vault	165,125.00
<b>Total 10000 · Cash &amp; Bank</b>	<b>165,125.00</b>
<b>Total Checking/Savings</b>	<b>165,125.00</b>
<b>Total Current Assets</b>	<b>165,125.00</b>
Fixed Assets	
15000 · Furniture and Equipment	
1501 · Furniture & Fixtures	12,000.00
1520 · Computers, POS Equipment	8,000.00
1550 · Security Equipment	18,000.00
<b>Total 15000 · Furniture and Equipment</b>	<b>38,000.00</b>
17000 · Leasehold Improvements	
1701 · Leasehold Improvements	100,000.00
<b>Total 17000 · Leasehold Improvements</b>	<b>100,000.00</b>
<b>Total Fixed Assets</b>	<b>138,000.00</b>
Other Assets	
18000 · Licenses	
1810 · Licenses	40,000.00
<b>Total 18000 · Licenses</b>	<b>40,000.00</b>

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Cash Basis



**Balance Sheet**  
As of December 31, 2025

	<u>Dec 31, 25</u>
19000 · Other Assets	
1901 · Security Deposit - Rent	5,000.00
1960 · Prepaid Insurance	2,000.00
	<hr/>
<b>Total 19000 · Other Assets</b>	<b>7,000.00</b>
	<hr/>
<b>Total Other Assets</b>	<b>47,000.00</b>
	<hr/>
<b>TOTAL ASSETS</b>	<b><u>350,125.00</u></b>
<b>LIABILITIES &amp; EQUITY</b>	
Equity	
30000 · Opening Balance Equity	
30100 · Member 1 Contribution	65,000.00
30200 · Member 2 Contribution	105,000.00
30300 · Member 3 Contribution	105,000.00
30400 · Member 4 Contribution	90,000.00
30500 · Member 5 Contribution	90,000.00
30600 · Member 6 Contribution	90,000.00
	<hr/>
<b>Total 30000 · Opening Balance Equity</b>	<b>545,000.00</b>
	<hr/>
32000 · Retained Earnings	-325,625.00
Net Income	130,750.00
	<hr/>
<b>Total Equity</b>	<b>350,125.00</b>
	<hr/>
<b>TOTAL LIABILITIES &amp; EQUITY</b>	<b><u>350,125.00</u></b>

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Cash Basis



**Profit & Loss**  
January through December 2023

	<u>Jan - Dec 23</u>
<b>Ordinary Income/Expense</b>	
<b>Expense</b>	
60000 · Facilities Expenses	
6100 · Rent Expense	19,800.00
6105 · Triple Net expenses	1,200.00
6200 · Utilities	1,400.00
6225 · Phones, Internet	1,750.00
6725 · Janitorial Expense	350.00
	<hr/>
<b>Total 60000 · Facilities Expenses</b>	24,500.00
80000 · Administrative Expenses	
8910 · Accounting Fees	1,200.00
8920 · Legal Fees	4,000.00
8930 · Consulting Fees	2,000.00
	<hr/>
<b>Total 80000 · Administrative Expenses</b>	7,200.00
<b>Total Expense</b>	<hr/> 31,700.00
<b>Net Ordinary Income</b>	<hr/> -31,700.00
<b>Net Income</b>	<hr/> <b>-31,700.00</b> <hr/>



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 Cash Basis



**Profit & Loss**  
 January through December 2024

	<u>Jan - Dec 24</u>
<b>Ordinary Income/Expense</b>	
<b>Income</b>	
40000 · Sales Revenue	
4020 · Sales - Inhalants	22,400.00
4030 · Sales - Edibles	46,000.00
4035 · Sales - Tinctures	24,000.00
4040 · Sales - Topicals	31,000.00
4050 · Sales - Accessories	4,250.00
	<hr/>
<b>Total 40000 · Sales Revenue</b>	127,650.00
	<hr/>
<b>Total Income</b>	127,650.00
<b>Cost of Goods Sold</b>	
50000 · Cost of Goods Sold	
5020 · COGS - Inhalants	11,200.00
5030 · COGS - Edibles	23,000.00
5035 · COGS - Tinctures	12,000.00
5040 · COGS - Topicals	15,500.00
5050 · COGS - Accessories	1,950.00
5150 · Safety, Compliance	1,350.00
5600 · Permits & Fees	7,000.00
5900 · Uniforms	1,125.00
5910 · Equipment Rentals	750.00
5950 · Direct Supplies	1,800.00
	<hr/>
<b>Total 50000 · Cost of Goods Sold</b>	75,675.00
	<hr/>
<b>Total COGS</b>	75,675.00
	<hr/>
<b>Gross Profit</b>	51,975.00
<b>Expense</b>	
60000 · Facilities Expenses	
6100 · Rent Expense	21,600.00
6105 · Triple Net expenses	1,200.00
6200 · Utilities	2,400.00
6225 · Phones, Internet	2,250.00
6700 · Repairs & Mtce - Facility	700.00
6725 · Janitorial Expense	1,050.00
6750 · Repairs & Mtce - Equipment	250.00
6800 · Insurance Expense	7,000.00
	<hr/>
<b>Total 60000 · Facilities Expenses</b>	36,450.00
70000 · Wages and Benefits	
7100 · Wages	152,250.00
7120 · Salaries	57,500.00
7140 · Payroll Expenses - Employer	31,000.00
7150 · Payroll Processing Fees	700.00
7160 · Workers Comp	4,500.00
7190 · Training	4,500.00
	<hr/>
<b>Total 70000 · Wages and Benefits</b>	250,450.00

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Cash Basis



**Profit & Loss**  
January through December 2024

	<u>Jan - Dec 24</u>
80000 · Administrative Expenses	
8100 · Salaries	30,000.00
8140 · Payroll Expenses - Employer	4,500.00
8300 · Advertising, Marketing	9,000.00
8325 · Website, Social Media	2,700.00
8400 · Travel	600.00
8450 · Meals and Entertainment	750.00
8500 · Office Supplies	700.00
8600 · Bank & Service Charges	350.00
8910 · Accounting Fees	2,400.00
8920 · Legal Fees	8,000.00
	<hr/>
Total 80000 · Administrative Expenses	59,000.00
	<hr/>
Total Expense	345,900.00
	<hr/>
Net Ordinary Income	-293,925.00
	<hr/>
Net Income	<u>-293,925.00</u>

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Cash Basis



**Profit & Loss**  
January through December 2025

	<u>Jan - Dec 25</u>
<b>Ordinary Income/Expense</b>	
<b>Income</b>	
40000 · Sales Revenue	
4020 · Sales - Inhalants	250,000.00
4030 · Sales - Edibles	400,000.00
4035 · Sales - Tinctures	200,000.00
4040 · Sales - Topicals	300,000.00
4050 · Sales - Accessories	45,000.00
	<hr/>
Total 40000 · Sales Revenue	1,195,000.00
	<hr/>
<b>Total Income</b>	<b>1,195,000.00</b>
	<hr/>
<b>Cost of Goods Sold</b>	
50000 · Cost of Goods Sold	
5020 · COGS - Inhalants	125,000.00
5030 · COGS - Edibles	200,000.00
5035 · COGS - Tinctures	100,000.00
5040 · COGS - Topicals	150,000.00
5050 · COGS - Accessories	20,000.00
5150 · Safety, Compliance	1,500.00
5600 · Permits & Fees	7,000.00
5900 · Uniforms	1,300.00
5910 · Equipment Rentals	750.00
5950 · Direct Supplies	2,500.00
	<hr/>
Total 50000 · Cost of Goods Sold	608,050.00
	<hr/>
<b>Total COGS</b>	<b>608,050.00</b>
	<hr/>
<b>Gross Profit</b>	<b>586,950.00</b>
	<hr/>
<b>Expense</b>	
60000 · Facilities Expenses	
6100 · Rent Expense	21,600.00
6105 · Triple Net expenses	1,200.00
6200 · Utilities	3,500.00
6225 · Phones, Internet	2,250.00
6700 · Repairs & Mtce - Facility	1,500.00
6725 · Janitorial Expense	1,500.00
6750 · Repairs & Mtce - Equipment	1,000.00
6800 · Insurance Expense	7,000.00
	<hr/>
Total 60000 · Facilities Expenses	39,550.00
	<hr/>
<b>70000 · Wages and Benefits</b>	
7100 · Wages	167,000.00
7120 · Salaries	94,000.00
7140 · Payroll Expenses - Employer	39,000.00
7150 · Payroll Processing Fees	1,200.00
7160 · Workers Comp	9,000.00
7190 · Training	5,500.00
	<hr/>
Total 70000 · Wages and Benefits	315,700.00

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Cash Basis



**Profit & Loss**  
January through December 2025

	<u>Jan - Dec 25</u>
80000 · Administrative Expenses	
8100 · Salaries	60,000.00
8140 · Payroll Expenses - Employer	9,000.00
8300 · Advertising, Marketing	12,000.00
8325 · Website, Social Media	3,000.00
8400 · Travel	750.00
8450 · Meals and Entertainment	1,000.00
8500 · Office Supplies	1,500.00
8600 · Bank & Service Charges	700.00
8910 · Accounting Fees	5,000.00
8920 · Legal Fees	8,000.00
<b>Total 80000 · Administrative Expenses</b>	<u>100,950.00</u>
<b>Total Expense</b>	<u>456,200.00</u>
<b>Net Ordinary Income</b>	<u>130,750.00</u>
<b>Net Income</b>	<u><u>130,750.00</u></u>

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**Statement of Cash Flows**  
January through December 2023

	<u>Jan - Dec 23</u>
<b>OPERATING ACTIVITIES</b>	
Net Income	-31,700.00
<b>Net cash provided by Operating Activities</b>	<u>-31,700.00</u>
<b>INVESTING ACTIVITIES</b>	
17000 · Leasehold Improvements:1701 · Leasehold Improvements	-100,000.00
18000 · Licenses:1810 · Licenses	-40,000.00
19000 · Other Assets:1901 · Security Deposit - Rent	-5,000.00
19000 · Other Assets:1960 · Prepaid Insurance	-2,000.00
<b>Net cash provided by Investing Activities</b>	<u>-147,000.00</u>
<b>FINANCING ACTIVITIES</b>	
30000 · Opening Balance Equity:30100 · Member 1 Contribution	65,000.00
30000 · Opening Balance Equity:30200 · Member 2 Contribution	105,000.00
30000 · Opening Balance Equity:30300 · Member 3 Contribution	105,000.00
30000 · Opening Balance Equity:30400 · Member 4 Contribution	90,000.00
30000 · Opening Balance Equity:30500 · Member 5 Contribution	90,000.00
30000 · Opening Balance Equity:30600 · Member 6 Contribution	90,000.00
<b>Net cash provided by Financing Activities</b>	<u>545,000.00</u>
<b>Net cash increase for period</b>	<u>366,300.00</u>
<b>Cash at end of period</b>	<u><u>366,300.00</u></u>

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**Statement of Cash Flows**  
January through December 2024

	<u>Jan - Dec 24</u>
<b>OPERATING ACTIVITIES</b>	
Net Income	-293,925.00
<b>Net cash provided by Operating Activities</b>	-293,925.00
<b>INVESTING ACTIVITIES</b>	
15000 · Furniture and Equipment:1501 · Furniture & Fixtures	-10,000.00
15000 · Furniture and Equipment:1520 · Computers, POS Equipment	-7,000.00
15000 · Furniture and Equipment:1550 · Security Equipment	-15,000.00
<b>Net cash provided by Investing Activities</b>	-32,000.00
<b>Net cash increase for period</b>	-325,925.00
<b>Cash at beginning of period</b>	<u>366,300.00</u>
<b>Cash at end of period</b>	<u><u>40,375.00</u></u>

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**Statement of Cash Flows**  
January through December 2025

	<u>Jan - Dec 25</u>
<b>OPERATING ACTIVITIES</b>	
Net Income	<u>130,750.00</u>
Net cash provided by Operating Activities	130,750.00
<b>INVESTING ACTIVITIES</b>	
15000 · Furniture and Equipment:1501 · Furniture & Fixtures	-2,000.00
15000 · Furniture and Equipment:1520 · Computers, POS Equipment	-1,000.00
15000 · Furniture and Equipment:1550 · Security Equipment	<u>-3,000.00</u>
Net cash provided by Investing Activities	<u>-6,000.00</u>
Net cash increase for period	124,750.00
Cash at beginning of period	<u>40,375.00</u>
Cash at end of period	<u><u>165,125.00</u></u>

## 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.

*Azetha Dix*

Printed Name of Verifying Individual

*Owner*

Title of Verifying Individual

*Azetha O. Brown, Dsp*

Signature of Verifying Individual

*28 Dec 2022*

Verification Date



**The Applicant's verified tax plan demonstrates understanding of, and plans for compliance with, all applicable tax laws, including but not limited to providing all information required for purposes of the taxes levied by Chapter 2A of Title 20, Code of Alabama 1975 (as amended), and payment of the same.**

The applicant has reviewed the applicable tax laws of Alabama on the state, county and local levels.

The applicant will comply with all taxes levied by Chapter 2A of Title 20, Code of Alabama 1975 (as amended) and any future updates.

The applicant will apply for the required business privilege licenses.

The applicant will file and pay cannabis sales taxes as required by the state each month on or before the required date.

The applicant will file and pay state income taxes as required. Quarterly or monthly payments will be made as required by law.

The applicant's point of sale system (Biotrack) will automatically calculate the specific cannabis and sales taxes required by the state on a real time basis. These taxes will print out on the patients' receipts; the system also provides sales and tax data by hour, shift, day, month or any selected time frame. These reports allow accounting personnel to readily calculate sales taxes due and complete the Alabama tax reports. These reports will also allow Alabama to easily audit sales and taxes.

The applicant will engage a third party payroll processing system to create paychecks, calculate employee and employer taxes, and remit all taxes on a timely basis to federal and state authorities.

Exhibit 6 - Tax Plan

Our tax advisor has nine years of cannabis experience in several states and will both oversee and approve all tax remittances.

A CPA accredited in Alabama will be on retainer and will approve the financial statements and have access to the detailed general ledger prior to filing state and federal tax returns.

## 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.

*Aretha Dix*  
Printed Name of Verifying Individual

*owner*  
Title of Verifying Individual

*Aretha Q. Dixon Dix*  
Signature of Verifying Individual

*20 Dec 2022*  
Verification Date

STATE OF ALABAMA

DOMESTIC LIMITED LIABILITY COMPANY (LLC)  
CERTIFICATE OF AMENDMENT

PURPOSE: In order to amend a Limited Liability Company's (LLC) Certificate of Formation under Section 10A-5A-2.02 of the *Code of Alabama 1975*, this Certificate of Amendment and the appropriate filing fees must be filed with the Office of the Secretary of State.

1. The current recorded name of the Limited Liability Company:

Le Bleu Fields Business Solutions, LLC

2. The date the Certificate of Formation was filed: 06 / 11 / 2022 (MM/DD/YYYY)

3. Alabama Entity ID Number (Format: 000-000-000): XXXXXXXXXX **TO OBTAIN ID NUMBER,** website at [www.sos.alabama.gov](http://www.sos.alabama.gov) click on Business Services (below picture), click on Business Entity and Name Search, click on Entity Name, enter the name of the entity in the appropriate box, and enter. Click on the number and verify that this is the correct entity. **This step is strongly recommended.**

(For SOS Use Only)

Alabama  
Sec. Of State  
001-024-573      DLL  
Date      12/28/2022  
Time      22:03:15  
File      \$100.00  
County      -----  
Total      \$100.00

**DOMESTIC LIMITED LIABILITY COMPANY AMENDMENT**

4. The following amendment was adopted on 12 / 28 / 2022 (MM/DD/YYYY):

See attached.  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

Additional Amendments and the dates on which they were adopted are attached.

\*Be very specific about what must be changed if you are amending existing information.

\*If the amendment includes a name change, a copy of the **Name Reservation Certificate** issued by the Office of Secretary of State **must be attached**.

\*Registered agents and registered agent addresses are changed by filing a Change Of Registered Agent Or Registered Office By Entity form directly with the Office of the Secretary of State (the new agent's signature is required agreeing to accept responsibility). **Agent information will NOT be changed with an amendment.**

5. The undersigned authorized signature certifies that the amendment or amendments have been approved in the manner required by Title 10A of the *Code of Alabama of 1975* and the governing documents of this entity.

12 / 28 / 2022  
Date (MM/DD/YYYY)

Aretha Q. Brown-Dix  
\_\_\_\_\_  
Signature as required by 10A-5A-2.04

Owner  
\_\_\_\_\_  
Title/capacity to sign under 10A-5A-2.04

**Amendment Details**

**Entity Info**

**Current Entity Name**  
Le Bleu Fields Business Solutions, LLC

**Type**  
Limited Liability Company (LLC)

**Entity ID**  
[REDACTED]

**Formation Date**  
[REDACTED]

**Members and Addresses**

**Original**

Member	Street Address	Mailing Address
Jablonski Frazier	[REDACTED]	[REDACTED]
Rory Murphy	[REDACTED]	[REDACTED]
Alexandra Davis	[REDACTED]	[REDACTED]
Brenda Gunsallus	[REDACTED]	[REDACTED]

**Amended**

Member	Street Address	Mailing Address
Jablonski Donta Frazier	[REDACTED]	[REDACTED]
Rory Murphy	[REDACTED]	[REDACTED]
Darlene Alexandra Davis	[REDACTED]	[REDACTED]
Brenda Gunsallus	[REDACTED]	[REDACTED]
Diane Reilly	[REDACTED]	[REDACTED]

## Exhibit 8 - Business License and Authorization of Local Jurisdictions

### 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.


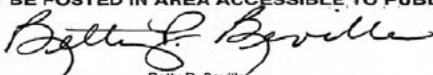
*Aretha Dix*  
Printed Name of Verifying Individual

*Owner*  
Title of Verifying Individual

*Aretha Q. Brown, DNP*  
Signature of Verifying Individual

*28 Dec 2022*  
Verification Date

**8.1 – As applicable, certified copies of the Applicant’s business license.**

<p>THIS LICENSE EXPIRES</p> <p><b>December 31st</b></p> <p>PLEASE RENEW BY FEBRUARY 1ST OF THE FOLLOWING YEAR</p>	<p>CITY OF MONTGOMERY MONTGOMERY, ALABAMA</p> <p>20  22</p> <p><b>BUSINESS LICENSE</b></p>	<p>No. 20230000546</p> <p>LICENSE VALID ONLY AT LOCATION INDICATED <b>NON TRANSFERABLE</b></p>
<p>MAILING NAME AND ADDRESS</p> <p>LE BLEU FIELDS BUSINESS SOLUTIONS LLC 216 N PERRY ST MONTGOMERY, AL 36104-3879</p>		<p>LOCAL TRADE NAME AND PHYSICAL LOCATION</p> <p>LE BLEU FIELDS BUSINESS SOLUTIONS LL NPL</p>
<p>THE FIRM, CORPORATION, ORGANIZATION, BUSINESS OR PERSON, WHOSE NAME APPEARS ABOVE HAS PAID THE REQUIRED LICENSE FEE AND IS AUTHORIZED TO ENGAGE IN BUSINESS IN MONTGOMERY, ALABAMA AS INDICATED BELOW.</p>		
<p>CODE</p> <p>541600</p>	<p>ACCOUNT NUMBER</p> <p>CONSULTANT</p>	<p>LICENSE NUMBER</p> <p>RECEIPT NUMBER</p> <p>TYPE OF LICENSE</p>
<p>DATE ISSUED</p> <p>11/30/2022</p> <p>MONTGOMERY, ALABAMA</p>	<p><b>MUST BE POSTED IN AREA ACCESSIBLE TO PUBLIC</b></p> <p> Betty P. Beville Director of Finance</p>	<p><b>NOTICE</b> License issued subject to compliance with all pertinent city codes.</p>





**State of Alabama  
Department of Revenue**

**Certificate of Compliance**

**Le Bleu Fields Business Solutions, LLC** is found to be in compliance for purposes of the issuance of a Certificate of Compliance from the Alabama Department of Revenue. An examination of the Alabama Department of Revenue's records for the following accounts: Corporate Income, Excise, Pass Through Entity, Business Privilege, Business & License Tax, Withholding, International Fuel Tax Agreement, International Registration Plan, and Sales and Use Tax, reveals that the aforementioned taxpayer/entity has filed all applicable tax returns and paid the tax or taxes, interest amounts, and any penalties that were reported due for all tax returns, assessments, and/or audit liabilities that were owed, as of September 12, 2022. No representation is made as to the accuracy of the amounts reported. Like all taxpayers, this taxpayer is subject to audit and billing for additional amounts for periods within the statute of limitations.

*IN WITNESS WHEREOF, I hereunto set my hand this  
date of September 12, 2022.*

A handwritten signature in black ink, appearing to read "Wanda J. Rhea".

\_\_\_\_\_  
*Disclosure Officer*

**Phone: 334-242-1189**

**Fax: 334-242-1030**

Request Date: September 12, 2022  
Request Code: 22091218562139

John H. Merrill  
Secretary of State

P.O. Box 5616  
Montgomery, AL 36103-5616

# STATE OF ALABAMA

**I, John H. Merrill, Secretary of State of Alabama, having custody of the Great and Principal Seal of said State, do hereby certify that**

pursuant to the provisions of Title 10A, Chapter 1, Article 5, Code of Alabama 1975, and upon an examination of the entity records on file in this office, the following entity name is reserved as available:

**Le Bleu Fields Business Solutions, LLC**

This name reservation is for the exclusive use of Aretha Dix, 215 North Perry Street, Montgomery, AL 36104 for a period of one year beginning June 11, 2022 and expiring June 11, 2023



RES028373

**In Testimony Whereof, I have hereunto set my hand and affixed the Great Seal of the State, at the Capitol, in the city of Montgomery, on this day.**

June 11, 2022

Date

A handwritten signature in black ink that reads 'J. H. Merrill'.

John H. Merrill

Secretary of State

**8.2 The Applicant's business presence in each applicable local jurisdiction**



City of  
**GADSDEN**

P. O. Box 267  
Gadsden, Alabama 35902  
Phone: (256) 549-4520  
FAX: (256) 549-4851

Heath Williamson  
*Director of Engineering*

Nick Hall  
*Director of Planning*

December 27, 2022

LeBleu Fields Business Solutions, LLC  
d/b/a LeBleu Fields

Re: Zoning Verification Letter  
525 South 3<sup>rd</sup> Street  
Building C & D  
Gadsden, AL 35901  
Medical Cannabis Dispensary

To Whom it May Concern:

The subject property located at 525 South 3<sup>rd</sup> Street, Building C & D, Gadsden, AL, 35901, is located within the corporate limits of the City of Gadsden and has a zoning designation of O-1, Office District. The City of Gadsden Chart of Permitted Uses, Chapter 130, Section 312(f) allows for a Medical Cannabis Dispensary as a "use by right" in an O-1, Office District. This letter does not exempt this use or property from any other requirements for permitting or licensing.

A Medical Cannabis Dispensary, as proposed to be located at 525 South 3<sup>rd</sup> Street, Building C & D, Gadsden, AL, 35901, being a "use by right" in an O-1, Office District, is eligible to apply for a City of Gadsden business license only after the applicant has received a provisional Integrated Facility license or a provisional Medical Cannabis Dispensary license, as may be applicable, from the Alabama Medical Cannabis Commission.

The subject property is in compliance with the Alabama Medical Cannabis Commission Rules and Regulations, Chapter 8, Regulation of Dispensaries, Section 538-x-8-.04. Requirements and Limitations as to Dispensing Sites.

This information was researched on December 27, 2022, by the undersigned, per request and as a public service. The undersigned certifies that the above information contained herein is believed to be accurate and is based upon, or relates to the information provided by the requestor. The Authority assumes no liability for errors or omissions. All information was obtained from public records, which may be inspected during regular business hours. Should you have further questions, please contact me at 256-549-4525.

Sincerely,

A handwritten signature in blue ink that reads "Tina P. Cody".

Tina P. Cody  
Zoning Administrator  
City of Gadsden Planning Department

**City of Champions**

2022/371

ORDINANCE NO. O-37-22

**AUTHORIZING THE OPERATION OF A MEDICAL CANNABIS  
DISPENSARY WITHIN THE CORPORATE LIMITS OF  
THE CITY OF GADSDEN, ALABAMA**

WHEREAS, on May 17, 2021, the Governor for the State of Alabama signed Darren Wesley 'Ato' Hall Compassion Act into law (the "Act"); and

WHEREAS, the Act provides for the medical use of marijuana for patients with qualifying medical conditions and a valid medical cannabis card; and

WHEREAS, a dispensary may only be operated in a municipality if the municipality has passed a resolution authorizing the operation of dispensaries within the municipality's corporate limits; and

WHEREAS, the Act authorizes and requires the Medical Cannabis Commission to heavily regulate dispensary operation, (See §20-2A-50 - §20-2A-68, Code of Alabama), thus addressing any health, safety or welfare concerns for the citizens of the City of Gadsden; and

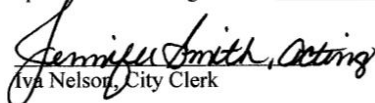
WHEREAS, the location of a dispensary within the corporate limits of the City of Gadsden will bring the potential of new employment opportunities for the citizens of the City of Gadsden; and

WHEREAS, a dispensary would be required to purchase a business license and pay sales tax to the City of Gadsden, thus increasing revenue;

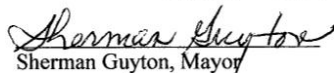
Now, Therefore, BE IT RESOLVED BY THE CITY COUNCIL OF THE CITY OF GADSDEN, ALABAMA, as follows:

1. The Gadsden City Council does hereby authorize the operation of medical cannabis dispensing sites, cultivators, processors, secure transporters, or integrated facilities licenses within the corporate limits of the City of Gadsden.
2. The City Clerk or designee is hereby directed to forward a copy of this Ordinance to the Alabama Medical Cannabis Commission.
3. This Ordinance shall become effective upon its passage and publication as required by law.

I certify that the City Council of the City of Gadsden, Alabama, duly adopted this Ordinance at an open public meeting held on October 11, 2022.

  
Jennifer Smith, Acting  
Iva Nelson, City Clerk

APPROVED on October 11, 2022

  
Sherman Guyton, Mayor

# CITY OF GADSDEN

December 13, 2022

Alabama Medical Cannabis Commission  
P.O. Box 309585  
Montgomery, Alabama 36130

To Whom It May Concern,

I am writing to express support for this applicant to open and operate a medical cannabis facility in Gadsden. The City of Gadsden has established a task force of administrative leaders to facilitate inquiries and assist with the application process, and this company has been in contact with our administration throughout their application development process.

I feel their business will be beneficial to Gadsden residents and the goals of the state.

I appreciate you taking the time to review my thoughts on their application. If you need any additional information from me, please contact me.

Sincerely,



Craig Ford, Mayor



## 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.

*Aretha Dix*

Printed Name of Verifying Individual

*Owner*

Title of Verifying Individual

*Aretha O. Brown, Sup*

Signature of Verifying Individual

*28 Dec 2022*

Verification Date

**9.1 – A clearly defined business structure and plan for adherence to applicable corporate conventions.**

The applicant is an LLC, with an S-Corp election. The individual members of the LLC have defined roles and responsibilities as detailed in the operational plan. The three Alabama residents hold the majority of shares as required.

The applicant will maintain the books and records of the company according to Generally Accepted Accounting Principles (GAAP) and will engage a 3rd party CPA firm on retainer for financial compliance and to file state and federal tax returns.

**9.2 – Clearly defined business goals, including a 3-year and a 5-year plan.**

Please see attached: Projected Profit/Loss, Balance Sheet and Cash Flow Analysis

The applicant's business goals encompass four categories:

Category 1- Economic

- a) to renovate/upfit our first location within 6 months of being granted a license
- b) to form business relationships with growers/manufacturers, processors, distributors to ensure high quality product on a consistent basis
- c) to hire, train employees, & open for business within 12 months of being granted a license
- d) to become instrumental in forming a cannabis association to ensure that all members of the industry have access to and are aware of statutory changes, compliance issues, and on-going education from knowledgeable professionals.
- e) to be profitable and to open a second dispensary by the end of year two
- f) to open a third dispensary by the end of year three

Category 2 - Human

- a) To attract and retain qualified and committed employees
- b) To pay higher than market rate wages

Exhibit 9 - Business Plan

c) To create an environment that allows for acceptance, personal growth and a safe and healthy working environment

Category 3 - Social

- a) To ensure quality products and fair prices for patients
- b) To ensure fair employment practices
- c) To serve the community, especially those who are disadvantaged
- d) To protect the environment
- e) To become a role model in the industry

Category 4 - Organic

- a) To re-invest profits to strengthen the business and achieve community and employee engagement
- b) To improve reputation and brand
- c) To drive innovative ideas and practices
- d) To grow the business to meet demand

**9.3 - An Organizational Chart - a diagram that visually conveys the Applicant's internal structure by detailing the roles, responsibilities, and relationships between individuals within an entity.**

Please see attached: Ownership-Interest-Flowchart

**9.4 - Job descriptions of all managerial positions, showing clear delineation of authority, qualifications, and duties.**

Le Bleu Fields Business Solutions LLC

**Name: Aretha Dix**

Title: General Manager - oversees all managers, liaison with LLC attorney and AMCC

**Name: Brenda Gunsallus**

Exhibit 9 - Business Plan



Title: Assistant General Manager - oversees managers, liaison with LLC attorney and AMCC

**Name: Darlene Davis**

Title: Security Manager - for premises and employee security, handles 3rd party security vendors; oversees cash security

**Name: Dana Beneway**

Title: Compliance and Training Manager - ensures employees & company meet requirements (AMCC, OSHA)

**Name: Diane Reilly**

Title: Controller - financial management & control, advises GM, maintains dotted line relationship to all other managers

**Name: Rory Murphy**

Title: Certified Lead Dispenser/Inventory Control - inventory intake, enters all inventory into METRC, updates data, maintains destruction records

**Name: Jablonski Frazier**

Title: Community Liaison - interacts with the community spreading information about the medicinal properties of cannabis.

**9.5 – Job descriptions of all non-managerial employee positions, showing clear delineation of qualifications and duties.**

Name: TBD

Title: Accounting assistant - count and reconcile daily cash, maintain cash drawers, other activities as required

Name: TBD

Title: Admin/HR - maintain employee records, assist compliance and training manager, builds schedules

Name: TBD

Title: Assistant managers shifts 1 and 2

Name: TBD

Title: Accounting/admin - accounts payable, ad hoc reports as required,

Name: TBD

Exhibit 9 - Business Plan

Title: Additional positions when 2nd and 3rd stores open

Name: TBD

Title: Certified Dispensers

Name: TBD

Title: additional positions when 2nd and 3rd stores open

**9.6 - An executive summary, including mission statement, leadership background and qualifications, business style and philosophy, key personnel, identification of facility location(s) and function(s).**

Mission Statement

To serve the patient community providing a welcoming environment, with kind, compassionate and understanding staff, and quality cannabis products. To create a working environment for our employees that is safe, healthy and educational. To be a positive influence in the community through outreach and beneficial community events.

Leadership

Our shareholders have extensive and in-depth experience gained from service in the military and law enforcement, health care, public service, accounting and management consulting, and several years managing successful cannabis dispensaries in other states. They have Masters degrees in Business Administration, Science Management, Accounting, and numerous certifications for IT, Medical Administration, teaching and security.

Business Style and Philosophy

We subscribe to an inclusive business style. While there is a corporate structure and clear lines of authority and communication, we believe that every member of the staff has something positive to bring and share and make the company a better place. We believe in comprehensive training and education for all. We do not tolerate racism, harassment, intolerance or anything that would make an employee or a patient uncomfortable.

While a business must ultimately earn a profit to survive, that is not our main focus. We believe that if you do the right things for patients, employees, third party vendors and the community at large, then the business will prosper.

#### Key Personnel

General Manager - oversees all aspects of the business, keeps business partners informed, works closely with AMCC and the corporate attorney, sets general business guidelines

Compliance and Training Manager - ensures employees are well trained, Biotrack and METRC are functioning correctly, company is compliant with all rules and regulations, works closely with the inventory manager

Security Manager - oversees security staff, ensures functionality of cameras and alarms, works with outside vendors for same, oversees cash, vault and product security

Controller - responsible for financial management and control, liaises with outside tax CPA and company attorney, ensures GAAP is adhered to, sets financial policies and procedures

#### Facility locations

We have acquired an agreement to house our dispensary within the wonderful city of Gadsen, AL. The location is 525 South 3rd Street. We are located in an ordinance approved site within the medical district. We have expectations of acquiring additional Dispensary sites to operate as the medical cannabis program matures. However we are thrilled to have city officials and the community members welcoming our Dispensary to the medical landscape, and look forward to providing the highest quality products and information to our patients.

#### **9.7 - A description of services and/or products to be cultivated, processed, transported, dispensed, or tested at each facility, as applicable.**

Applicant will build rapport with AMCC approved cultivators and processors to provide our patients with the highest quality, lab tested cannabis medicines available.

Currently the AMCC have approved:

- **Tablets and Capsules** - pills, or capsules, are cannabis in pill form. These pills can contain many forms of cannabis, such as extracted oil, decarboxylated cannabis flower, or single cannabinoids, such as THC or CBD. Tablets are optimal for patients searching for consistent dosing who don't want to deal with the added sugars or calories in edibles. Capsules are also discreet and highly portable, allowing medical cannabis users to take their medicine on the go if needed. Cannabis capsules are also a healthier and more precise alternative for those who don't enjoy smoking or vaping and are available in a range of formulations that suit various patient needs. Shelf life is typically 1 year.
- **Gels, Oils, and Creams for topical use** - A cannabis topical is a lotion, gel, salve, or ointment that is applied directly to the skin. Topicals can provide fast-acting, localized relief of inflammation, stiffness, and pain. Cannabis topicals are typically non-intoxicating, which allows patients to enjoy the plant's potential therapeutic effects without THC's attendant psychoactivity. When you use cannabis-infused topicals, THC can bind directly to CB1 receptors present in skin, muscle tissues, and nerves, and that brings relief to the affected area. It also makes its way into the bloodstream, where it interacts with CB2 receptors. Topical cannabis can get distributed to the rest of the body via the blood, but this happens so slowly that most people don't detect any mental effect. Shelf life is typically 1 year.
- **Tinctures** - Tinctures are one of the oldest methods of concentrating plant compounds in medicine. They have historically been used to extract the benefits of a wide variety of plants, including cannabis. Sublingual is the preferred method of administration because the tincture is rapidly absorbed through the sublingual artery. Sublingual applications avoid first pass metabolism in the gut or liver, because they transmit active ingredients into the bloodstream directly through the lining of the mouth. (Cannabinoids, as well as pharmaceuticals, can be lost or degraded when being metabolized in the gut or liver, resulting in a smaller dose than expected.) Sublingual application allows for a rapid onset of 15-30 minutes with

peak effects at around 90 minutes, which can be helpful for handling intense breakthrough pain. Alternatively, tinctures can be used like an edible: swallowed or added to food, the THC is converted to the more potent form 11-hydroxy-THC, which delays onset by around two hours and produces stronger, more sedative effects than sublingual application. Tinctures can also be used topically (like a liniment), however this application is more popular with infused cannabis oils. The best topical applications for alcohol-based tinctures are those where a drying, astringent effect is beneficial, such as for acne, skin irritation or injuries deep below the surface of the skin. Do not apply to mucous membranes or wounds. Shelf life is typically 1 year.

- **Suppositories** - THC and CBD suppositories are round, cone-, or bullet-, shaped doses of medicine that are inserted into the rectum or vagina. Once the suppository is inserted, it melts and releases the healing power of cannabinoids into our bodies. Cannabis suppositories can contain THC or CBD, or a combination of both. They will often use ingredients like coconut oil, avocado oil, or cocoa butter as a base since cannabinoids are fat soluble. Suppositories are considered to be an effective way for those experiencing severe nausea or vomiting to medicate. Suppositories allow the THC and CBD to be absorbed quickly into our bodies through rectal or vaginal mucosa. Since cannabinoids like THC and CBD are fat-soluble, they're able to be absorbed into our body tissue and spread locally. This can be thought of similar to a topical cream that you apply to the area you are seeking relief. But instead of applying it to your skin, suppositories release the healing power of cannabis internally in a more localized and targeted manner. Shelf life is typically 1 year.
- **Transdermal patches** - a THC patch is a thin piece of plastic coated with adhesive (like a Band-aid™) and infused with the cannabinoid THC. Because of the way they work, THC patches can offer all-day or all-night relief to those suffering from chronic issues like pain and anxiety. To get this relief, you simply apply the THC patch to a venous part of your body, like your ankle, your arm, or the inside of your wrist. Your body heat activates the patch and causes it to release a small amount of THC through your skin and into your bloodstream. When you apply a THC patch to your skin, you set up a drug concentration gradient. That just means that at one point (in the patch), there's a lot of the cannabinoid, while at another point (in your skin), there's

not a lot of the cannabinoid. When your skin's heat activates the patch, the cannabinoid begins to spread out into your skin (this is technically known as "moving down the gradient"). This concept is very much like pouring boiling water into a coffee mug and leaving it sitting on your counter. The hot water contains a lot of heat (212°F worth), while the atmosphere around it doesn't. Because of this difference (the gradient), the heat naturally "spreads out" into the air around it. As the drug moves further into your skin, it's absorbed into your bloodstream and transported to your brain and throughout your body. The nice thing about transdermal delivery is that it bypasses your lungs, liver, and stomach (places where the cannabinoid is filtered or broken down). That means you get 100 percent of the medicinal value of the THC. Shelf life is typically 1 year.

- **Nebulizers** - A nebulizer is a device that delivers a mist of medicine that's easily inhaled into the lungs. Nebulizers have been used for respiratory illnesses such as asthma, chronic obstructive pulmonary disease (COPD) and even cystic fibrosis for decades. They have proved an efficient way to administer medication to the body without irritating the lungs and throat. Rather than heating cannabis as one would by vaporizing or smoking, nebulizing sends compressed air through a specially formulated cannabis solution and turns it into micro particles, which are one to five microns in size, that can be inhaled into the lungs. Nebulizing is the only pulmonary delivery method that doesn't require heating or combustion of the cannabis product. And unlike edibles, dosage can be controlled, too, which is especially beneficial for those using cannabis medically. Shelf life typically is 1 year.
- **Liquids or oils for use in an inhaler** - These cannabis infused inhalers act as bronchodilators, a long word that simply means any medical device that causes your throat and airways to relax, opening space for more air to flow through. Asthma inhalers function in this way so that a person does not run out of air when an asthma attack causes their airways to contract. Cannabis as a bronchodilator actually has a lot of research behind it: a study as far back as the 1970s revealed that cannabis smoke, unlike tobacco smoke, causes the airways to loosen, meaning weed for asthma can be beneficial. Furthermore, cannabis use affects our CB1 receptors of the nervous system, not only loosening muscle groups but reducing pain. Using a

cannabis inhaler means no combustion, smoke or coughing. Better still, these inhalers have better bioavailability, meaning that the THC and/or CBD in their vapor gets into the bloodstream in higher quantities and at greater speeds. Shelf life is typically 1 year.

Our Dispensary will have qualified Certified Dispensers to assist and direct our patients to the most effective form of treatment available for their given conditions within the AMCC regulations.

### **9.8 - An advertising/marketing analysis and strategy**

As cannabis becomes increasingly accepted across the United States, more and more businesses are getting involved in the cannabis industry. And with any business, marketing is a key component to successfully operating a cannabis business. But because cannabis is such a new and regulated industry, marketing a cannabis business can be tricky.

Laws and regulations are different in each state as, for example, some types of advertising might not be allowed. In the online world, Facebook, Instagram, and Google also have their limitations, but they do offer certain advertising opportunities for cannabis businesses.

Even with these restrictions, we can still find options to advertise and market our cannabis business. We will work within the AMCC regulations as well as cannabis marketing experts who are familiar with all the rules and can help make a detailed marketing plan.

### **9.9 - A Community Engagement Plan describing all efforts that have been or will be made to foster the Applicant's relationship with, involvement in, and commitment to any community (including municipality or county) in which the Applicant intends to locate a facility within the next three years.**

We intend on interacting with the community in as many ways as allowed within the guidelines set forth by the AMCC. The information we intend to disseminate will build confidence in regards to many therapeutic effects cannabis offers. Applicant will engage in existing organizations and establish new groups to help further the benefits of this medicine. We are fully committed as soon as we commence and into the foreseeable future to be an asset to the community of Gadsen where our first facility will be located.

Current community organizations members of Company belong to include:

Advocates and community leaders in the national cannabis community - A town hall hosted by our Company members this past July in Hazel Green, AL. The event was attended by many and we had a chance to fellowship with the community on many benefits cannabis may bring.

Applicant attended Women Veterans Health Expo, July 2022 7:30-4:30pm. UAB Hill Center, 1400 University Boulevard, Birmingham, AL 35233

Our Company sponsors local events at dispensaries we currently operate which focus on Women in Cannabis Wellness, as well Veterans who consume cannabis products for medical relief.

**9.10 – An Environmental Impact Statement outlining the anticipated impact of each of the Applicant’s proposed operations, per facility, on the local environment.**

The Applicant is acutely aware of the environmental impact any business can have. Our goal is to create policies that help us make the best decisions when it comes to impacting the environment. Sustainable living means reducing waste. It means protecting local ecosystems and preserving natural resources like water, green space, and clean air. The goal of our environmental policy is to protect the environment for future generations. Generally, environmental law is broken into two categories: pollution control and remediation, and conservation of natural resources.



The Applicant will look for locations that are close to the public transit system or within a medical park so that patients can easily access our facilities. We hope to encourage our patients to take public transit and will also offer incentive programs to our employees, encouraging them to use it as well, if available.

### Minimizing Environmental Impact

ISO 14001 is an internationally agreed-upon standard that sets out the requirements for an environmental management system. It helps organizations improve their environmental performance through more efficient use of resources and reduction of waste. It creates the criteria for an environmental management system that is certifiable. It maps out a framework that a company can follow to set up an effective environmental management system, assuring company management and employees as well as external stakeholders that environmental impact is being measured and improved.

Our Company considers all environmental issues relevant to its operations, such as air pollution, water and sewage issues, waste management, energy efficiency, soil contamination, climate change mitigation and adaptation, and resource use and efficiency. Efficiency use will include recycling and purchasing of energy efficient office supplies.

### Considerations

Our Environmental Management System applies steps to ensure our actions are effective. These include assessing the environmental impact of our business, developing appropriate key performance indicators, setting objectives, and targets and reviewing these regularly. There are many reasons why an organization should take a strategic approach to improve its environmental performance:

- Demonstrate compliance with current and future statutory and regulatory requirements Increase leadership involvement and engagement of employees
  - Improve the business' reputation and the confidence of the community
  - Achieve strategic business aims by incorporating environmental issues into business management
- Provide a competitive and financial advantage through improved efficiencies and reduced costs

- Encourage better environmental performance of suppliers by integrating them into the organization's business systems

## Implementation

### Reduce Energy:

Timers on lights. All of our lighting fixtures will be on automated timers allowing for energy conservation. These timers have been shown to reduce energy costs, are digital, programmable on a 24-hour cycle with battery backup.

Efficiency lighting (LED) - we will LED bulbs throughout our dispensary, which are energy-efficient bulbs that last longer than traditional bulbs.

Solar panels - our buildings (wherever practical and applicable) will install solar panels for energy efficiency. These will store power to use with our backup battery systems giving them longer operational capabilities should a power outage occur.

All thermostats will be on programmable timers to increase efficiency.

### Reduce Water Consumption and Waste

Installation of low flush toilets which use considerably less water than standard toilets. We plan on installing high-efficiency toilets that only use 1.1-gallons of water to flush. This type of fixture reduces water use by more than 30 percent over the 1.6-gallon model, which adds up to potential water savings of more than 4,000 gallons per toilet, per year.

The Applicant will install energy-efficient water heaters. Water heaters will have to hold small holding tanks with inline heaters. This will ensure water is dispensed immediately at a temperature of 100 degrees Fahrenheit, appropriate for microbial decontamination. It saves thousands of gallons of water a year by not having to waste gallons of water waiting for the correct hand washing temperature, eliminating water waste for efficiency while remaining compliant with our hand washing standard operating procedures. The Applicant will utilize a timer on the water heater. We will install a programmable timer on the electric water heater. The water will not heat during building closure and will save the Company an additional 5%-12% of energy annually. Lastly, the Applicant will install motion sensor faucets. This installation will reduce water waste as water does not run unless hands are directly in front of the sensor turning on water only as it is needed.

## Building and Construction Materials

### LEED's Buildings:

Applicant will endeavor to source suppliers who use LEEDS products.

### Examples of supplies:

- LEED Certified Paint Products
- LEED Energy efficient radiant barrier reflective metal roofing and siding. LEED Standards for windows that meet the minimum solar reflective index.
- LEED Durasheath-3R Wall Insulation a rigid foam plastic thermal insulation board composed of environmentally sound, closed cell polyisocyanurate foam core bonded to specially coated glass fiber mat facers on each side.

Applicant will ensure that all construction or building modifications are in full compliance with State laws and adhere to all local codes and ordinances. Applicant will also ensure our dispensary meets all the codes and requirements for the American for Disabilities Act. This will include the regulations set forth in the Environmental Barriers Act. Resource Need and Product Recycling Program. Our policy is to reduce, reuse and recycle before putting anything in the trash.

1. Packaging- We will encourage our Vendors to use eco-friendly and recyclable packaging. For items that need to be packaged, we will source vendors who offer both compostable and recyclable packaging. On the patient's first visit to the dispensary, we will explain the use of our reusable childproof, tamper evident 'exit bags'.
2. Recyclable Paper Products - We will commit to purchasing only 100% recycled paper for the dispensary. Employee access to iPads and other electronics will help to eliminate paper waste.
3. Recyclable Office Supplies - whenever possible, our office supplies will be made from recycled materials including pens, markers (vegetable dyes for composability).
4. Reusable glasses- Our breakroom supplies will include a 5-gallon water cooler. Employees will be encouraged to use the washable glasses provided to rehydrate during shifts to reduce the number of plastic bottles on the premises.

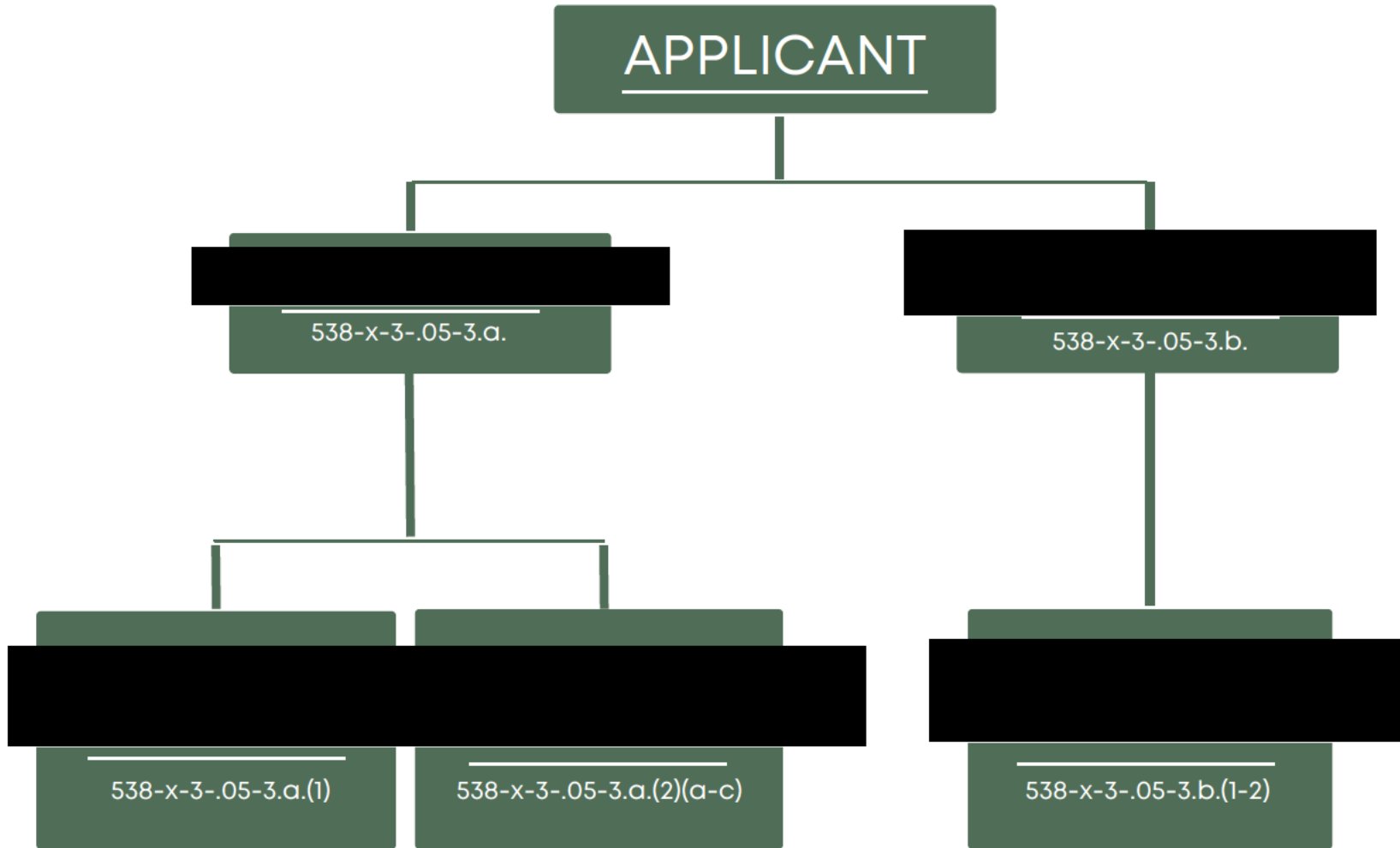
5. Recycle Bins- Recycle bins will be in the dispensary and outside the main entrance, and in the parking area to encourage environmental behaviors. A paper shredder will be onsite to reduce the volume of paper waste.

**9.11 - An insurance plan, including declarations pages and letters of intent, if any, from an A-rated insurer as to, at a minimum, casualty, workers' compensation, liability.**

Applicant will maintain Insurance for all facilities according the AMCC requirements:

Please see attached Cannas Capital's Insurance Letter of Intent:

# OWNERSHIP INTEREST FLOWCHART





**Cannas Capital Insurance Agency**

1657 Getty St.  
Muskegon Heights, MI

November 28 ,2022

Addressee: [REDACTED]  
Address: 215 N. Perry St.  
Montgomery, Al, 36104

To Whom It May Concern:

The above business meets the necessary requirements for insurance coverage for up to \$2,000,000.00 aggregated protection under general liability, \$1,000,000.00 for products and operation, and worker's compensation in statutory amounts and limits, and employer liability in limits of not less than \$1,000,000 per incident.

The operation meet the qualifications for insurance and our company standards. With the intent to operation as a Cannabis Business all licensing requirements must be met to obtain all coverage.

Issue of full quote and premium amount will be providing within 60 days final licensing approval and binding.

Sincerely Yours,

*Cimone Casson*

Cimone Casson

# **Exhibit 10 - Evidence of Business Relationships 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.**

*Dory Murphy*

**Printed Name of Verifying Individual**

*Owner*

**Title of Verifying Individual**

*[Handwritten Signature]*

**Signature of Verifying Individual**

*02-27-2023*

**Verification Date**

**10.1 - Any Cultivator or prospective Cultivator.**

As of now we do not have any contracts, contingent contracts, memoranda of understanding with prospective Cultivators.



**10.2 – Any Processor or prospective Processor.**

DocuSign Envelope ID: DFEFF5A1-8D13-4A9A-8FE2-A3503A7E0D9F



**Memorandum of Understanding Between Native Black Cultivation and LeBleu Fields Business Solutions**

This Memorandum of Understand (hereafter known as an “MOU”) reflects our understanding, at the present time, of certain preliminary discussions we have had concerning the *(describe transaction e.g. transportation, testing, etc.)* and is intended to be an outline to assist us in preparing a definitive final agreement, pending a license is granted by the Alabama Medical Cannabis Commission.

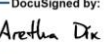
1. This MOU is not intended to contractually bind either of us in any way, nor shall we be legally bound until an agreement, in form and content satisfactory to each of us and our respective counsel is fully executed by us.
2. Execution of this MOU shall not obligate either party to accept any particular terms but will preclude both parties from insisting on any terms that are inconsistent with those terms described in this MOU.
3. It is expressly agreed that if a mutually acceptable final agreement will be entered into after the point of licensure and each party will have an opportunity to discuss the terms of said agreement.

This Memorandum of Understanding shall only be disclosed to the Alabama Medical Cannabis Commission and shall not be disclosed to anyone other than the parties, their employees, attorneys, accountants and/or any investors of either party.

In witness whereof, the parties to this MOU through their duly authorized representatives have executed this MOU on the days and dates set out below, and certify that they have read, understood, and agreed to the terms and conditions of this MOU as set forth herein.

DocuSigned by:  
  
E56F98C8EDCB486...  
 Antoine Mordican, CEO  
 Native Black Cultivation

11/23/2022  
 \_\_\_\_\_  
 Date

DocuSigned by:  
  
77490BD4EDC64AE...  
 Signature of Partner

11/23/2022  
 \_\_\_\_\_  
 Date

LeBleu Fields Business Solutions  
 Business Name

**• 10.3 – Any Secure Transporter or prospective Secure Transporter.**

DocuSign Envelope ID: 09FAD8EC-3257-4ABF-A3F6-90EBA303D2A1

**Memorandum of Understanding**

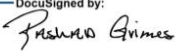
This Memorandum of Understand (hereafter known as an “MOU”) between LeBlou Field and Business Solutions reflects our understanding, at the present time, of certain preliminary discussions we have had concerning the (*describe transaction e.g. transportation, testing, etc.*) and is intended to be an outline to assist us in preparing a definitive final agreement, pending a license is granted by the Alabama Medical Cannabis Commission.

1. This MOU is not intended to contractually bind either of us in any way, nor shall we be legally bound until an agreement, in form and content satisfactory to each of us and our respective counsel is fully executed by us.
2. Execution of this MOU shall not obligate either party to accept any terms but does insist that both parties use “**Best Efforts**” to come to a contractual agreement to use each other services if both parties are awarded a license by the Alabama Medical Cannabis Commission. **Best Efforts shall be perceived to mean each party will do all that can be possibly done to seek and obtain an end.**
3. It is expressly agreed that if a mutually acceptable final agreement will be entered into after the point of licensure and each party will have an opportunity to discuss the terms of said agreement.

This Memorandum of Understanding shall only be disclosed to the Alabama Medical Cannabis Commission and shall not be disclosed to anyone other than the parties, their employees, attorneys, accountants and/or any investors of either party.

DocuSign Envelope ID: 09FAD8EC-3257-4ABF-A3F6-90EBA303D2A1

In witness whereof, the parties to this MOU through their duly authorized representatives have executed this MOU on the days and dates set out below, and certify that they have read, understood, and agreed to the terms and conditions of this MOU as set forth herein.

DocuSigned by:  
  
E794838BC6E5744B  
\_\_\_\_\_  
Rashad Grimes, CEO  
Dippi Logistics

12/13/2022  
\_\_\_\_\_

\_\_\_\_\_  
Aretha Dix  
Partner's Name

12/13/2022  
\_\_\_\_\_

DocuSigned by:  
  
04CB140F90CC4FE  
\_\_\_\_\_  
Partner's Signature

\_\_\_\_\_  
LeBleu Fields Business Solutions, LLC  
Partner's Company Name

**10.4 – Any Integrated Facility or prospective Integrated Facility.**

As of now we do not have any contracts, contingent contracts, memorandum of understanding with prospective Integrated Facilities.

**10.5 – Any State Testing Laboratory or prospective State Testing Laboratory.**

As of now we do not have any contracts, contingent contracts, memorandum of understanding with prospective State Testing Laboratories.

We will look forward to building relationships with whom the AMCC grants licenses .

## 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.

*Aretha Dix*

Printed Name of Verifying Individual

*Owner*

Title of Verifying Individual

*Aretha Q. Brown-Dix*

Signature of Verifying Individual

*28 Dec 2022*

Verification Date

**The Applicant must provide a plan for receiving and coordinating information and certifications from registered certifying physicians recommending medical cannabis products for patient and caregiver customers.**

The dispensing and sale of medical cannabis will only be to a registered qualified patient or registered caregiver holding a valid, unexpired, and unrevoked medical cannabis card, and only within the sales area of the dispensing site. This Includes several requirements for and expectations of physicians who may provide qualifying patients (QP's) with written certifications.

Qualifying Patients and Caregivers must present a valid medical cannabis card to enter the dispensary.

The dispensary shall ensure that:

1. A patient record is established and maintained for each holder of a valid registry identification card who obtains cannabis-infused products from the dispensary;
2. An entry in a patient record shall be recorded only by a dispensary agent who is authorized by the policies and procedures of the dispensary to make an entry;
3. That an entry is dated and signed by a dispensary agent who is recording the entry;
4. The entry includes the number of the dispensary agent who is recording the entry;
5. The entry is not changed to make the initial entry illegible.

If an electronic signature is used to sign an entry, the dispensary agent whose signature the electronic code represents is accountable for the use of the electronic signature.

A patient's record shall only be accessed by a dispensary agent authorized by the General Manager of the dispensary to access the patient record.

The dispensary shall provide to the AMCC the patient record upon request by the Commission. A patient record shall be protected from loss, damage, or unauthorized use;

and shall be maintained for at least 5 years after the date on which the patient or his or her designated primary caregiver last received cannabis infused products from the dispensary.

Applicant will maintain patient records electronically (BioTrack), the dispensary shall ensure that there are safeguards to prevent unauthorized access and the date and time of an entry in a patient record is recorded electronically by an internal clock.

The dispensary shall ensure that the patient record for a holder of a valid medical cannabis card or caregiver who enters the dispensary to obtain medical cannabis contains the following information:

1. The name of the patient
2. The date and birth of the patient
3. The name of the designated caregiver of the patient, if applicable and
4. Any documentation of any patient education and support materials that have been provided to the patient or caregiver, including a description of the materials and the date on which the materials were provided.

For each time the patient requests or designated caregiver requests and is denied access to medical cannabis from the dispensary the following will be recorded in the patient record:

1. The date
2. The name and number of the registry identification card of the patient/caregiver who requested the cannabis product
3. The reason the cannabis products were not provided.



## 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.

*Aretha Dix*

Printed Name of Verifying Individual

*Owner*

Title of Verifying Individual

*Aretha Q. Brown*

Signature of Verifying Individual

*23 Dec 2022*

Verification Date



**The Applicant must provide a plan for point-of-sale education, consultation, provision of information, responses to patient and caregiver questions, and instructions for use regarding all medical cannabis products, to be conducted by the certified dispenser at each dispensing site.**

In each dispensary there will be at least one consultation room where patients and/or caregivers can meet privately with a knowledgeable and compassionate certified dispenser. The dispenser's role is not to give medical advice, but to educate patients on cannabis, how specific cannabis products react with the cannabinoids in your body, how these products benefit a wide range of devastating illnesses, and how they alleviate pain. Should the certified dispenser be unable to answer a question, the patient will be referred back to their certified physician. Additionally, we will have printed literature the patient can take home. All products in the dispensary are packaged with the requisite information the AMCC requires from manufacturers.

Certified dispensers will undergo training for the patient registry system BIOTRACK, the AMCC website and the METRC seed to sale system. METRC will not allow access to their system nor assign a user login unless the person has undergone METRC's extensive training. Most importantly, certified dispensers will learn how to communicate in a compassionate and highly effective manner. Certified Dispensers will use experience and education to assist patients in the best way possible, with the understanding for many patients and caregivers, this is a first or near first experience with cannabis as medicine.

Training certificates of completion of the training as required by the AMCC will be signed by the individual upon completion and our Compliance Officer will track education for each employee, have all certificates available for AMCC for review during inspections and also have such certificates available electronically upon the Commission's request. All certificates will be stored in a secure area for 3 years.

**Responses to Patients and Caregiver Questions:**

Patient must be at least 19 years of age and all caregivers must be at least 21 years of age.

Cannabis is a psycho-active substance, as it is capable of producing profound changes to a person's mental emotional state. This is one of the reasons that cannabis is such an effective medicine at producing a powerful sense of wellbeing. The mental-emotional state of a person is very complex and constantly seeking a state of balance. The ingestion of any psycho-active substance has the potential of temporarily upsetting this balance and inducing symptoms such as anger, sadness, anxiety, depression, paranoia, panic attacks, and lack of motivation. Individuals predisposed to mental-emotional illness or suffering from mental-emotional illness such as schizophrenia, may be of higher risk to cannabis induced mental emotional imbalances. Above all, medical cannabis is known for its ability to help people cope with nausea and reduced appetite, pain and discomfort, muscle tension and spasms as well as provide a feeling and sense of overall well-being and comfort. Safety is the primary benefit of cannabis use, as there is no lethal overdose level. No one has ever died from ingesting too much cannabis; nor has cannabis ever caused liver or kidney damage or organ failure. This singles out cannabis from other prescribed pain medications as not only being effective but extremely safe to the human body. It is true that any smoke or product of combustion potentially contains carcinogens or other products that are harmful to the lungs and body if inhaled. A vaporizer can be used as an alternative to smoking in order to reduce potential risk from smoke, combustion products and heat. Some in the medical community believe repetitive heat delivery to the air passages and lungs may affect lung elasticity and overall, long-term performance. Risk may be reduced by decreasing the temperature of inhaled smoke or using alternative methods of dosing. Alternatives to smoking include vaporization as well as edible dose delivery in capsules, foods, suppositories or teas. Transdermal delivery through the skin such as in creams, oils, salves, balms, infusions, poultices, soaps, etc. are also effective.

Certified Dispensers will help the patient understand that any time a person ingests a psycho-active substance, there is a risk they may not feel the way they had intended, especially as a result of the ingestion of larger doses. Above all it should be again noted that

no one has ever physically overdosed from cannabis and if any mental-emotional discomfort or anxiety occurs, it will resolve within hours as the medication metabolizes. As a psychoactive substance, cannabis may affect a person's decision making and physical coordination. Therefore, no one should operate heavy equipment or motor vehicles or participate in responsibilities and activities that require focus and attention such as child care while impaired, due to the influence of cannabis or any other substance.

Cannabis use may have effects on heart rate and blood pressure. Therefore, patients with severe heart conditions should discuss this with their physician. Cannabis may elicit schizophrenic episodes in patients who are predisposed to schizophrenia, Individuals with a past medical history of schizophrenia or family history of schizophrenia may be contraindicated for cannabis use. Patients using other prescription mood altering medications or narcotic pain medications should inform their physician of medical cannabis use. Pregnancy: Cannabis constituents can pass through breast milk and to the fetus during pregnancy, therefore, patients should inform the physician if currently pregnant or considering pregnancy.

With every new strain of medical cannabis, new batch or with different preparations or modes of administration; the first thing to remember is always to begin with the smallest possible dose, give it plenty of time to completely take effect and take note of how this dose makes you feel. Does it achieve the desired results? Does it induce any negative side effects? If the dose did not achieve the desired results and did not produce any negative side effects then the patient can re-dose with a small incremental increase in dose as needed. If the dose produces any negative side effects reduce the dose or discontinue use and consult your medical cannabis experienced physician. Wait at least one hour for inhalation and at least 2.5 hours for edibles and transdermal administrations to realize full effect before redosing. A personal medical journal for each patient is the best way to record and determine optimum dosing for each product of medical cannabis.

Certified Dispensers shall inform consumers of the endocannabinoid systems within the human body as well as most other living organisms excluding Invertebrates, the endocannabinoid system consists of cannabinoid type messenger molecules and specific cannabinoid type receptor molecules that the body uses for communication and signaling specifically to maintain balance within the nervous system and the immune system. It turns out that cannabis is the only known plant that significantly interacts with the endocannabinoid system in humans; hence the name. Originally it was thought that the only active cannabinoid in cannabis was THC because it produces the psychoactive or euphoric effect. As a result most cannabis strains have been bred to be very high in THC. Although more recently discovered, cannabis has many different cannabinoid molecules that all have a certain amount of activity or ability to bind to endocannabinoid receptors and have biochemical effects in the human body. Cannabidiol (CBD) is the second most abundant cannabinoid to THC in the cannabis plant and does not cause the psychoactive effects produced by THC in fact it may help to blunt the psychoactive effects caused by THC.

A daily log or journal is the best way to evaluate over time, one's benefit and/or negative effects from medical cannabis use. Patients should use these logs to self evaluate symptoms, effects and benefits as well as to provide this information to the certified dispenser in return visits which will assist in recommending the most appropriate medicine for medical cannabis use.

The Certified Dispensers are required to deny the sale of medical marijuana to a qualified patient or designated caregiver in the following events: The dispensary agent cannot verify the qualifying patient's or designated caregiver's identity or verifies that the evidence of identity being presented is not actual or is fraudulent. The dispensary agent verifies that the amount of medical marijuana the qualifying patient to exceed the limit.

The dispensary agent cannot verify the validity of the qualifying patient's or designated caregiver's registry identification card. The qualifying patient or designated caregiver appears to be impaired or abusing medical marijuana.

## 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.

*Aretha Dix*

Printed Name of Verifying Individual

*Owner*

Title of Verifying Individual

*Aretha Q. Brown, OAP*

Signature of Verifying Individual

*28 Dec 2022*

Verification Date

**The Applicant, with respect to its dispensary operations, must provide a plan pursuant to Rule 538-x-3-.05-3.m.(16)(i) and Rule 538-x-4-.07-12.o.(9), for maintaining confidential information and providing cybersecurity for sensitive information with respect to patients and caregivers.**

What patient information is confidential?

Confidentiality is one of the core duties of a medical cannabis dispensary. It requires providers to keep a patient's personal health information private unless consent to release the information is provided by the patient.

This means restricting access and uses of the patient information to other members of the healthcare team. Additionally, procedures should be implemented to help protect electronic health records from unauthorized access, alteration, and deletion.

Healthcare is among the most personal services rendered in our society; yet to deliver this care, scores of personnel must have access to intimate patient information. To receive appropriate care, patients must feel free to reveal personal information. In return, the healthcare provider must treat patient information confidentially and protect its security.

That being said, healthcare requires immediate access to information required to deliver appropriate, safe and effective patient care. All providers must be ever-vigilant to balance the need for privacy.

Maintaining confidentiality is becoming more difficult. While information technology can improve the quality of care by enabling the instant retrieval and access of information through various means, including mobile devices, and the more rapid exchange of medical information by a greater number of people who can contribute to the care and treatment of a patient, it can also increase the risk of unauthorized use, access and disclosure of confidential patient information. This includes the possibility of data being obtained and held for ransom. Within cannabis healthcare organizations, personal information contained in medical records is reviewed not only by providers and caretakers but also by

professionals in many clinical and administrative support areas. The obligation to protect the confidentiality of patient health information is imposed in every state by that state's own law, as well as the minimally established requirements under the federal Health Insurance Portability and Accountability Act of 1996 as amended under the Health Information Technology for Economic and Clinical Health Act and expanded under the HIPAA Omnibus Rule (2013). When it comes to covered entities, Alabama law's protections apply to all health information that the entity communicates or transmits. The covered communication can be oral, written or electronic. All information about the patient's mental health, their health care services or payment information is protected. It is imperative that we consult state patient privacy law to assure their compliance.

Protected health information can be used or disclosed by covered entities and their business associates (subject to required business associate agreements in place) for treatment, payment or healthcare operations activities and other limited purposes, and as a "permissive disclosure" as long as the patient has received a copy of the provider's notice of privacy practices, has signed acknowledgement of that notice, the release does not involve mental health records, and the disclosure is not otherwise prohibited under Alabama state law. All providers should be sure their notice of privacy practices meets the multiple standards under HIPAA, as well as any pertinent state law.

While media representatives also seek access to health information, particularly when a patient is a public figure or when treatment involves legal or public health issues, healthcare providers must protect the rights of individual patients and may only disclose limited directory information to the media after obtaining the patient's consent. Society's need for information does not outweigh the right of patients to confidentiality.

To disclose patient information, healthcare executives must determine that patients or their legal representatives have authorized the release of information or that the use, access or disclosure sought falls within the permitted purposes that do not require the patient's prior authorization. Healthcare executives must implement procedures and keep records to

enable them to “account” for disclosures that require authorization as well as most disclosures that are for a purpose other than treatment, payment or healthcare operations activities. Patients have the right to request and receive an accounting of these accountable disclosures under HIPAA or relevant state law.

### **Cybersecurity in Cannabis**

In today’s electronic world, cybersecurity in healthcare and protecting information is vital for the normal functioning of organizations. Cybercrime can include cybersecurity threats such as credit card theft, misuse of personally identifiable information, ransomware, or even trade secrets of cannabis retail, grows, and ancillary businesses. With various cybersecurity risks that threaten cannabis businesses, it only makes sense to set up security measures to mitigate these risks. There are a variety of solutions that can fit your specific business needs. This can include:

- Security Risk Assessments
- System Hardening
- Security Configuration
- Software & Hardware Security Updates
- Incident Response Plan
- Intrusion Detection Systems
- Malicious activity and Policy Violation Monitoring
- Access Management
- Firewalls
- Endpoint Detection & Response
- Data Loss Prevention
- Mobile Device Security Management
- Dark Web Monitoring
- Solutions to assess 3rd parties security such as partners & integrated vendors with access to your data

### **Email**



Email is a primary means for communication within healthcare organizations. Information of all kinds is transacted, created, received, sent and maintained within email systems. Mailbox storage capacities tend to grow with individuals storing all kinds of valuable information such as intellectual property, financial information, patient information and others. As a result, email security is a very important part of cybersecurity in healthcare.

Phishing is a top threat. Most significant security incidents are caused by phishing. Unwitting users may unknowingly click on a malicious link or open a malicious attachment within a phishing email and infect their computer systems with malware. In certain instances, that malware may spread via the computer network to other computers. The phishing email may also elicit sensitive or proprietary information from the recipient. Phishing emails are highly effective as they typically fool the recipient into taking a desired action such as disclosing sensitive or proprietary information, clicking on a malicious link, or opening a malicious attachment. Accordingly, regular security awareness training is key to thwart phishing attempts.

## 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.

*Aretha Dix*  
Printed Name of Verifying Individual

*Owner*  
Title of Verifying Individual

*Aretha Q. Baron-Dix*  
Signature of Verifying Individual

*28 Dec 2022*  
Verification Date

**The Applicant must provide a detailed plan for handling money and allocating and remitting taxes as required by any local, state or federal agency.**

Cash Receipts

The applicant will use Biotrack, a comprehensive online Point of Sale system created specifically for cannabis companies, which interfaces with the state mandated seed to sale system METRC, which controls inventory and compliance.

Should the internet go down, we also have pre-printed, 2-part, sequentially numbered receipts so that we can continue operations on a manual basis.

Cash registers are in a secured area (card access only), and the cashiers will be separated from the public by a counter and a plexiglass barrier.

A surveillance camera is placed over each register so transactions can be recorded and reviewed. Panic buttons are placed throughout this area and the dispensary.

A 2-part receipt is created by the POS system. One is for the customer, the other for our records and Biotrack records each transaction internally, by customer ID, name, cashier, date, product, etc. This data can be searched in many ways should the need arise. Each receipt shows the date, time, cashier ID, product, quantity, customer ID, taxes charged, total, change given. The company keeps its receipts for the mandated time frame in a secure area.

There are no returns allowed. In the event of an error, a receipt can be voided which must be approved by the manager on duty.

At the beginning of their shift, each cashier will count their drawer float to ascertain that it is correct. At the end of their shift, each cashier will count their drawer and document the amount counted, sign their cash count sheet, leaving their float money in their drawer for the next day. The manager will review and compare the POS system totals. Any discrepancies will be investigated and reported to the authorities, when necessary.

At the end of a shift, the shift manager will run each cashiers' cash through the electronic cash counter to verify the accuracy and then will consolidate all cash and run it through the counter again. Only then will the cash be placed in an opaque, sealable, sequentially

numbered bank bag. Each bag, number, date and amount is recorded in a CASH IN LOG before being placed in the fireproof safe located in the limited access vault room.

The following morning, accounting personnel will log on to Biotrack, and download the previous day’s sales activity. Biotrack produces a Z-Report by cash register and a Z-Report total for the day. It details sales, taxes, totals and number of tickets (transactions). They will also download the **Complex Sales Report (CSR)** which is a summary of all Z-Reports in greater detail, also showing average sale, number of sales, discounts and sales by product (both quantity and dollars).

Accounting personnel will use these reports to complete the following and compare the Grand Total to the total on the CASH IN LOG. Then this summary will be given to the owners for informational and cash flow purposes.

Date	Total Number of Sales	Cash Sales	Taxes	Total Cash In	Cash In Log	Variance
Grand Total						

Only owners can remove bank bags from the safe to pay vendors, taxes and so on. The removal of a bank bag is recorded in the CASH OUT LOG. (If Safe Banking is approved the cash would be deposited in a local accredited financial institution).

**Cash Payments**

As money is accumulated, the owners will withdraw bank bags in sequential order (first in, first out) to meet financial obligations.

As previously stated, the removal of a bank bag from the safe is recorded in the CASH OUT

LOG.

As money from this bag is used to pay bills, it is recorded on a PAYOUT RECORD sheet which is prepared daily (a separate sheet for each day).

It shows:

- The opening balance
- Vendor name
- Invoice number
- Amount
- Total expenditures for the day
- Remaining balance
- (the remaining balance becomes the opening balance for the following day)
- The applicable vendor invoices are attached as back up.

(Should we have a bank account, then our accounting system would produce a systems generated check and we would no longer need to do cash payouts).

When a vendor is paid by cash, the money is placed in a sealed envelope with the related invoice. The vendor or their licensed, bonded carrier must be in our secure office area, open the envelope, count the cash in view of a recording security camera, sign and date the invoice copy which we keep for our records and make a copy for the vendor to take back with the cash.

Cash is accumulated throughout the month. At month end, accounting personnel run the CSR for the entire month. This report is used to balance the cash in aggregate and also to prepare sales and use tax reports. Sales and other taxes will be paid in accordance with Alabama statutes on or before they are due. Federal and employer taxes will be paid in accordance with Federal statutes.

Accounting personnel will ensure that Use Tax is set up on any invoices where sales tax has not been correctly charged and will be remitted with Sales Tax on the required date.

## 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.

ARETHA DIX

Printed Name of Verifying Individual

OWNER

Title of Verifying Individual

ARETHA Q. BROWN DIX

Signature of Verifying Individual

28 Dec 2022

Verification Date

Applicant believes that clear operating procedures are essential for the safety and security of cannabis at each stage of the process. The procedures described herein shall control all procedures at the Company's dispensary including inventory control, security, acquisition, distribution and destruction of cannabis or cannabis waste products when required. The procedures described herein shall not be deviated from in the slightest degree without the expressed written permission of the general manager. Any violation of these procedures is grounds for immediate termination and possibly prosecution.

A hard copy shall remain on premise at all times. A copy of these policies and procedures will be provided to the Commission for review upon request. From time to time it is expected that these plans may be revised as the Commission or other authorities promulgate new regulations or as better practices are developed. Whenever these operational plans are updated or revised, the updated version will be made available to all employees and the facility copy shall be replaced by the updated version.

**15.1 – IT plan for ensuring accurate recordkeeping, compliance with inventory protocols, and coordination of information and systems with vendors, customers and others.**

Applicant will use Biotrack, BioTrack is the leading Seed-to-Sale inventory management and Dispensary Point-of-Sale software designed specifically for the cannabis industry. Applicant will work directly with cannabis cultivators, processors and manufacturers and will utilize the best inventory management software to seamlessly manage our product inventory through purchases, transfers, conversions and most importantly maintain confidential registry information regarding physicians, patients, and caregivers.

In order to comply with Alabama Medical Cannabis Patient Registry System (§

License Type: Dispensary  
20-2A-35, Code of Alabama 1975. Applicant shall use, and maintain a reliable IT system to track all aspects of patient and caregiver qualification. BioTrack integrates electronic patient and caregiver information Applicant receives with the registry, known as the Alabama Medical Cannabis Patient Registry System, that does all of the following:

- (1) Receives and records physician certifications.
- (2) Receives and tracks qualified patient registration and issuance of medical cannabis cards.
- (3) Receives and tracks designated caregiver registration and issuance of medical cannabis cards.
- (4) Includes in the patient registry database for each qualified patient registrant the name of the qualified patient and the patient's designated caregiver, if applicable, the patient's registered certifying physician, the respective qualifying medical condition or conditions, the recommended daily dosage and type of medical cannabis, and any other information the commission, by rule, deems relevant.
- (5) Verifies that a medical cannabis card is current and valid and has not been suspended, revoked, or denied.
- (6) Tracks purchases of medical cannabis at dispensaries by date, time, amount, and type.
- (7) Determines whether a particular sale of medical cannabis transaction exceeds the permissible limit.
- (8) Tracks medical cannabis cards that are denied, revoked, or suspended.
- (9) Interfaces as necessary with the statewide seed-to-sale tracking system established under AMCC.
- (10) Provides access as further provided in subsection (b) within the AMCC guidelines.

Metrc's robust track-and-trace program will help facilitate the Alabama Medical Cannabis Commission's data collection and regulatory oversight, enabling licensed operators to easily track all activities impacting the status of a plant or the creation of cannabis-based products, including origin, testing results, handling, and chain-of-custody information, through the Company's unique RFID tag model and



License Type: Dispensary  
software-as-a-service (SaaS) system. Seamless data tracking helps operators optimize inventory control, accurately report sales data, and improve cultivation management. This information is accessible to state regulators, providing the ultimate transparency to ensure regulatory compliance, help combat the illicit market, and safeguard the health and well-being of Alabama medical cannabis patients.

Applicant will ensure all employees who have access to entering and maintaining the information inputted in BioTrack as well as METRC will be extensively trained as and periodically checked to maintain the efficacy of the Dispensary.

Applicant will pay annual licensing and subscription fees for the programs on or before dates due.

**15.2 - Plan for maintenance and storage of cannabis and medical cannabis at all times while in possession and control of licensee, including the limitation of access to cannabis and medical cannabis to essential personnel by position.**

The Dispensary shall only sell products in containers that are designed to prohibit children from unlocking and opening the container.

Cannabis will be stored only in an enclosed, locked facility. At our dispensary, cannabis will be stored in a secure, locked device, display case, cabinet or room within the enclosed, locked facility. The secure, locked device, display case, cabinet or room must be protected by a lock or locking mechanism that meets at least the security rating established by Underwriters Laboratories for key locks. Company will use Watchnet, an electronic door locking system.

At the dispensary, cannabis may be removed from the secure setting described above:

- Only for the purpose of dispensing the cannabis;
- Only immediately before the cannabis is dispensed; and
- Only by a cannabis establishment agent who is employed by the dispensary.
- The dispensary is prohibited from selling cannabis or cannabis products to

License Type: Dispensary consumers through a third party, intermediary business, broker, or any business that does not hold a medical cannabis store license. The Dispensary may not accept sales of cannabis or cannabis products from a third party, intermediary business, broker, or any business that does not hold a AMCC medical marijuana license. The Dispensary is also prohibited from contracting with a third party or intermediary business to advertise delivery to consumers.

## **INCIDENT LOG REPORT**

Incident Reporting Policies and Procedures have been developed to ensure that the facility keeps accurate records of incidents including the diversion of any form of cannabis by loss or theft as set forth by the Regulations.

Employees will be required to complete an incident report form immediately following any of the events listed below. All incident report forms shall be kept on file and provided upon request to Management, the Police or the Commission, as appropriate. Each time an incident report form is filed, on duty security personnel shall make an entry to the Incident Log which shall serve as a chronological index.

Incidents Include:

- Loss or theft of cannabis
- Discrepancies in inventory
- Violent intrusions
- Loss of confidential information or intellectual property
- Workplace Violence-Harassment
- Unlawful behavior by co-workers
- Reporting violations of Alabama statutes, rules or local ordinances

### **15.3 – Quality Control/Quality Assurance Plan**

Exhibit 15 - Standard Operating Plan and Procedures

- Provided at Exhibit 23

#### **15.4 – Contamination and Recall Plan**

- Provided at Exhibit 24

#### **15.5 – Criminal Activity Plan. The Applicant must provide a clear written criminal activity plan, detailing the steps to be undertaken in the event of discovery of criminal activity related to cannabis or medical cannabis within the possession and control of the licensee.**

The Company will prevent unauthorized access to the establishment by implementing security equipment and other measures to deter entrance into limited areas.

The exterior of the building will be provided with adequate lighting to ensure the ability to see and identify any persons 24 hours a day. Loitering on or near the premises will be strictly prohibited.

Our organization will contract a qualified security firm to ensure absolute safety and security measures for our facilities. The security firm shall have years of experience, with demonstrated reliability over many years of service to demanding clients.

The security firm's primary focus and principal discipline is the protection of businesses and the safeguarding of the people, property, and assets of its clients. The Company may also wish to employ in-house security personnel who will be trained and comply with all regulations and these Standard Operating Procedures.

The company will designate a Security Manager or Director who shall at a minimum:

1. Conduct bi-annual audits of security measures to ensure compliance with establishment's stated procedures and to identify potential insecurities:
2. Train employees on security measures, emergency response, and robbery prevention and response prior to hiring and on an annual basis:

3. Evaluate credentials prior to hiring third-party security.
4. At least one employee of the cannabis establishment or the employees of any third party who provides security to the cannabis establishment must complete or will complete within three (3) months of being hired the following training:
  - a. Theft Prevention (or similar) training
  - b. Emergency Response (or similar) training
  - c. Use of Force training (or similar training that covers when force is and is not necessary)
  - d. CPR/First Aid training
  - e. Crime Scene Protection (or similar) training
  - f. Access Control (or similar) training
  - g. Minimum of (8) hours on-site security training
  - h. Minimum of (8) hours classroom security training
5. Proof of the training will be done by written attestation from the employee and the training officer

In the event of a discovery of criminal activity related to cannabis or medical cannabis within the possession and control of the licensee, Applicant will train all employees on safeguards such as where the panic buttons are located within the facility, areas designated to be safest (steel reinforced vaults) to move to in response to immediate threats or danger. Also all employees will carry two-way radio systems which will allow direct communication with security personnel to mitigate any criminal situations. Of Course in any event where employees as well as cannabis in possession are in danger, all employees will be directed to notify 9-1-1 as soon as possible. Employees' well being first and foremost will be of prime importance to our organization as well as maintaining secure locations for all cannabis related products in an effort to make sure consumers who depend on this medicine will always have access when needed.

**15.6 - Emergency Procedures/Disaster Plan. The Applicant must provide a clear written Emergency Procedures and Disaster Plan.**

Applicant understands that many of our customers may suffer from a medical condition. Applicant can reasonably anticipate the potential for a medical situation to arise. In the event of a medical emergency, Agents will be trained to call 9-1-1 and assess whether help can be provided in the meantime. Applicants are aware untrained individuals may endanger themselves and those they are trying to rescue. For this reason, it is generally wise to leave medical work to those who are trained, equipped, and certified. However, agents can still focus on communicating quickly and efficiently, staying calm, and being an asset to first responders. Applicant will train staff members and security to administer emergency life saving techniques so that time-critical measures can be safely administered. Agents will be trained to administer an EPI pen, provide C.P.R., and use a defibrillator. Additionally, the location, contact numbers, and directions for all medical facilities within a 15 Mile radius (closest first) will be prominently posted in high traffic areas.

Security Agents are aware it is a common practice for criminals to use a medical emergency as a distraction to accomplish a robbery. Security will make every effort to assist in medical emergencies but will confer with Agents on site in case closing procedures need to begin in case the emergency will affect business or not allow security to accomplish its tasks of providing adequate security, providing safety, and ensuring compliant business practices through adhering to security protocols.

In the event of a medical emergency, Applicant will ensure that Agents are trained to respond accordingly. For example, Agents should:

- Stay calm;
- Get help. Call out for someone to phone 9-1-1 or, if the person does not need immediate assistance, make the call personally;
- Follow instructions from the 9-1-1 operator and be ready and willing to assist until help arrives;
- Do not move the person unless he or she is in imminent danger or unless you cannot provide assistance without moving the person;
- Upon arrival of the Paramedics, remain on the scene and provide any specific

License Type: Dispensary  
information about the person and their condition that you are aware of; and

- Once Medical professionals are on scene and treating the patient, Agents will contact Applicant and pertinent personnel in the Dispensary chain of command to report the incident.

#### Fire Emergencies/Natural Disasters

All Agents will be trained on fire evacuation plans within the first 5 days of employment to include an understanding of the location of all fire extinguishers, emergency exits, contact points, and meeting points away from the building. The Chief Security Officer, in conjunction with the Compliance Agent, will ensure a fire extinguisher maintenance log is maintained and all fire safety equipment is always operational. An evacuation diagram with emergency contact information will be posted in all areas where agents and customers will occupy.

In the event of a fire emergency or natural disaster, Agents will be trained to:

- Stay calm;
- Move quickly to the nearest accessible exit;
- Assess whether you can attempt to extinguish the fire with a nearby extinguisher;
- Notify, and assist others to evacuate along the way;
- If there is time, push the nearest panic button to notify the authorities;
- Exit the building and meet at the designated area;
- Call 9-1-1 if not done so already; and
- Get a headcount of agents, confirmed by another Agent.

Applicant endeavors to prevent emergency situations whenever possible however, we also understand the importance of being prepared. We feel it is our imperative responsibility to ensure we have taken adequate measures to protect our staff, customers, our facility, and the public at large. As such we believe that prevention starts with physical security equipment, comprehensive training and fostering a work environment that values honest and open communication.

To promote preparedness and safe response procedures, Applicant will:

- Ensure the facility has at least 2 evacuation routes, preferably a third;
- Post evacuation routes in conspicuous locations throughout the facility;
- Include local law enforcement and first responders during any of the training exercises. The Security Agent in Charge will coordinate with the compliance officer and verify and sign off that the training has been completed.
- Encourage law enforcement, emergency responders, SWAT teams, K9 teams, and bomb squads to train for an active shooter scenario at the location.
- Place removable floor plans near entrance and exits for emergency responders

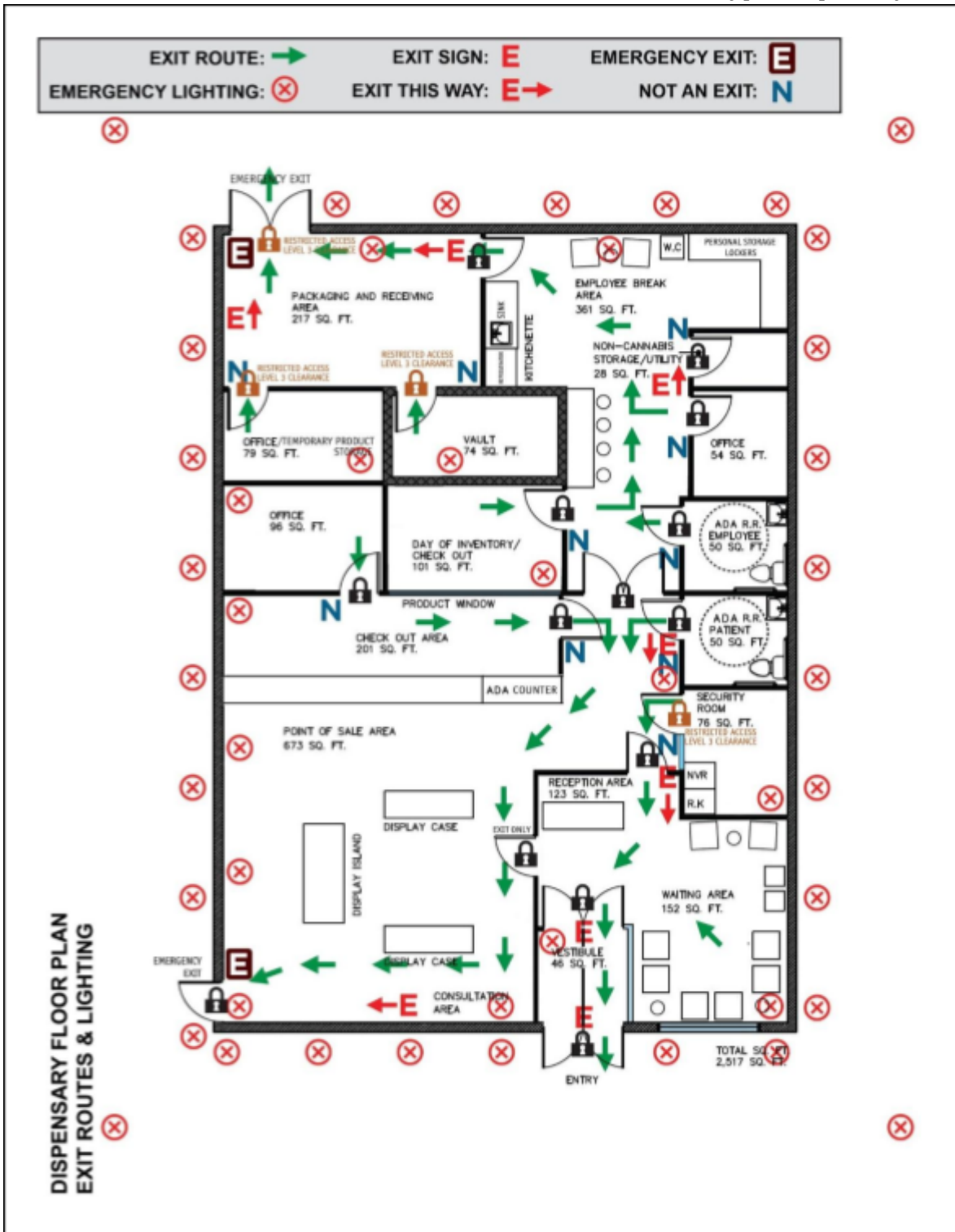


Exhibit 15 - Standard Operating Plan and Procedures



Our security system features three (3) elements that will work together to ensure maximum protection of the facility. These features are described below and include:

- Video Surveillance System
- Access Control System
- Intrusion Detection

The facility will have a single entrance, which will be secure, and implement strict security measures to deter and prevent the theft of cannabis and unauthorized entrance into areas containing cannabis.

Access will be granted by an authorized facility agent stationed at the security doorpost. Security personnel will ensure that the entrance and any additional doors required by state or local authorities related to fire safety remain closed at all times except to allow authorized individuals to enter the premises.

Any indication of damage or malfunction of the locking mechanisms will be reported to the Manager and Facility Coordinator immediately. An incident report describing the event will also be completed.

The facility will have an access control system installed on all doors. Access through different areas of the building will be controlled based on authority levels. Any malfunctioning door locks are to be reported to the Manager and Security immediately. Any area with cannabis will be restricted to only the agents needed in those areas.

**15.7 - Alcohol, Smoke, and Drug Free Workplace Policy. The Applicant must provide a clear written Alcohol, Smoke and Drug Free Workplace Policy, which shall be included in the Employee Handbook and/or the Policies and Procedures Manual.**

Applicant is committed to providing a safe and productive workplace for its employees. In keeping with this commitment, the following rules regarding alcohol and drugs of abuse have been established for all staff members, regardless of rank or position, including both regular and temporary employees. The rules apply during working hours to all employees of the Dispensary while they are on Company premises or elsewhere on Company business.

The manufacture, distribution, possession, sale, or purchase of controlled substances of abuse on Company property is prohibited. This includes the illegal manufacture, distribution, possession, sale, or purchase of marijuana.

Being impaired by illegal drugs, alcohol, or substances of abuse on Company property is prohibited.

Working while under the influence of prescription or recommended drugs that impair performance is prohibited.

So that there is no question about what these rules signify, please note the following definitions:

Company property: All Company owned or leased property used by employees.

Controlled substance of abuse: Any substance listed in Schedules I-V of Section 202 of the Controlled Substance Act, as amended.

Drug: Any chemical substance that produces physical, mental, emotional, or

behavioral change in the user.

Drug paraphernalia: Equipment, a product, or material that is used or intended for use in concealing an illegal drug, or otherwise introducing into the human body an illegal drug or controlled substance.

Illegal drug:

- a. Any drug or derivative thereof whose use, possession, sale, transfer, attempted sale or transfer, manufacture, or storage is illegal or regulated under any federal, state, or local law or regulation.
- b. Any drug, including – but not limited to – a prescription or recommended drug, used for any reason other than that prescribed or recommended by a physician.
- c. Inhalants used illegally

Under the influence: A state of not having the normal use of mental or physical faculties resulting from the voluntary introduction into the body of an alcoholic beverage, drug, or substance of abuse.

Consistent with the rules listed above, any of the following actions constitutes a violation of Applicants policy on drugs and may subject an employee to disciplinary action, up to and including immediate termination.

Using, selling, purchasing, transferring, manufacturing, or storing an illegal drug or drug paraphernalia, or attempting to or assisting another to do so, while in the course of employment.

Working or reporting to work, conducting Company business or being on Company property while under the influence of an illegal drug or alcohol, or in an impaired condition.

The use of tobacco products is permitted only in the designated outdoor areas. All employees must dispose of their tobacco properly. Cigarette “butts” should not be

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disposed of in Dispensary trash, nor left on the ground. Dispensary staff should enter and exit by the main door.

**15.8 –Employee Safety Plan in compliance with parallel OSHA standards applicable in workplaces similar to the type(s) proposed by the Applicant.**

Each employee is expected to obey safety rules and exercise caution and common sense in all work activities. Employees must immediately report any unsafe conditions to their supervisor. Employees who violate safety standards, cause hazardous or dangerous situations, or fail to report, or where appropriate, remedy such situations, may be subject to disciplinary action including termination of employment.

In the case of an accident that results in injury, regardless of how insignificant the injury may appear, employees should notify their supervisor immediately.

All employees will be trained and required to enroll in a OSHA 10 Hour Outreach Training Program - General Industry. Applicant will pay employees for hours, once they have passed the course. This will ensure personnel will be knowledgeable and aware of best practices to maintain a safe workplace for all.

**15.9 – Confidential Information and Cybersecurity Plan. The Applicant’s plan for maintaining confidential information and any records required to be confidentially maintained**

Confidentiality is one of the core duties of a medical cannabis dispensary. It requires providers to keep a patient's personal health information private unless consent to release the information is provided by the patient.

This means restricting access and uses of the patient information to other members of the healthcare team. Additionally, procedures should be implemented to help protect electronic health records from unauthorized access, alteration, and deletion.

Healthcare is among the most personal services rendered in our society; yet to deliver this care, scores of personnel must have access to intimate patient information. To receive appropriate care, patients must feel free to reveal personal information. In return, the healthcare provider must treat patient information confidentially and protect its security.

That being said, healthcare requires immediate access to information required to deliver appropriate, safe and effective patient care. All providers must be ever-vigilant to balance the need for privacy.

Maintaining confidentiality is becoming more difficult. While information technology can improve the quality of care by enabling the instant retrieval and access of information through various means, including mobile devices, and the more rapid exchange of medical information by a greater number of people who can contribute to the care and treatment of a patient, it can also increase the risk of unauthorized use, access and disclosure of confidential patient information. This includes the possibility of data being obtained and held for ransom. Within cannabis healthcare organizations, personal information contained in medical records is reviewed not only by providers and caretakers but also by professionals in many clinical and administrative support areas. The obligation to protect the confidentiality of patient health information is imposed in every state by that state's own law, as well as the minimally established requirements under the federal Health Insurance Portability and Accountability Act of 1996 as amended under the Health Information Technology for Economic and Clinical Health Act and expanded under the HIPAA Omnibus Rule (2013). When it comes to covered entities, Alabama law's protections apply to all health information that the entity communicates or transmits. The covered communication can be oral, written or electronic. All information about the patient's mental health, their health care services or payment information is protected. It is imperative that we consult state patient privacy law to assure their compliance.

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Protected health information can be used or disclosed by covered entities and their business associates (subject to required business associate agreements in place) for treatment, payment or healthcare operations activities and other limited purposes, and as a “permissive disclosure” as long as the patient has received a copy of the provider’s notice of privacy practices, has signed acknowledgement of that notice, the release does not involve mental health records, and the disclosure is not otherwise prohibited under Alabama state law. All providers should be sure their notice of privacy practices meets the multiple standards under HIPAA, as well as any pertinent state law.

To disclose patient information, healthcare executives must determine that patients or their legal representatives have authorized the release of information or that the use, access or disclosure sought falls within the permitted purposes that do not require the patient’s prior authorization. Healthcare executives must implement procedures and keep records to enable them to “account” for disclosures that require authorization as well as most disclosures that are for a purpose other than treatment, payment or healthcare operations activities. Patients have the right to request and receive an accounting of these accountable disclosures under HIPAA or relevant state law.

### **Cybersecurity in Cannabis**

In today’s electronic world, cybersecurity in healthcare and protecting information is vital for the normal functioning of organizations. Cybercrime can include cybersecurity threats such as credit card theft, misuse of personally identifiable information, ransomware, or even trade secrets of cannabis retail, grows, and ancillary businesses. With various cybersecurity risks that threaten cannabis businesses, it only makes sense to set up security measures to mitigate these risks. There are a variety of solutions that can fit your specific business needs. This can include:

- Security Risk Assessments
- System Hardening

- Security Configuration
- Software & Hardware Security Updates
- Incident Response Plan
- Intrusion Detection Systems
- Malicious activity and Policy Violation Monitoring
- Access Management
- Firewalls
- Endpoint Detection & Response
- Data Loss Prevention
- Mobile Device Security Management
- Dark Web Monitoring
- Solutions to assess 3rd parties security such as partners & integrated vendors with access to your data

## **Email**

Email is a primary means for communication within healthcare organizations. Information of all kinds is transacted, created, received, sent and maintained within email systems. Mailbox storage capacities tend to grow with individuals storing all kinds of valuable information such as intellectual property, financial information, patient information and others. As a result, email security is a very important part of cybersecurity in healthcare.

Phishing is a top threat. Most significant security incidents are caused by phishing. Unwitting users may unknowingly click on a malicious link or open a malicious attachment within a phishing email and infect their computer systems with malware. In certain instances, that malware may spread via the computer network to other computers. The phishing email may also elicit sensitive or proprietary information from the recipient. Phishing emails are highly effective as they typically fool the recipient into taking a desired action such as disclosing sensitive or proprietary information, clicking on a malicious link, or opening a malicious attachment. Accordingly, regular security awareness training is key to thwart phishing attempts.

### **15.10 – A plan for tracking and proper disposal of waste cannabis or medical cannabis, as necessary.**

Exhibit 15 - Standard Operating Plan and Procedures

The Applicant will complete daily inventory verifying that all products are accounted for in the system. The Inventory agent will check the state website along with applicant email every morning to check for alerts of recalled products. The department may also recall products of the state tracking system by putting entire batches on hold. As soon as any agent has been alerted that a batch was put on hold. The Inventory team will alert both the security and compliance departments. Should a recall event occur, or the Department issues a voluntary recall, our company has developed a policy and protocols for recalling products that were released into the market that pose any risk or hazard to our customers.

The Compliance Agent will manage BioTrack inventory data while designating physical records to the products. Products will be placed in a designated area within a restricted access room, away from other products and clearly labeled. Signs will be posted stating products are On-Hold. The signs designating items that have been recalled will state, in bold lettering, "ON HOLD - CANNABIS PRODUCT RECALL" and will note the cultivar and brand name, lot number, origination number, and quantity on hold. The Compliance Agent will investigate the situation and assess the extent of corrective action required. Consideration is also given to other lots that may be affected. If a recall action is deemed necessary by the Compliance Agent in Charge, then the Compliance Manager will access the distribution records from BioTrackTHC, to retrieve vendor registration, purchase orders, and distribution records within 24 hours of initiation of the recall.

The Compliance Agent will inform the Inventory Agent in charge of the recall action and the affected lots immediately. Sales will be suspended on the product immediately using the point of sale system (Biotrack). The recall will be issued for the entire product batch.

The Compliance Agent in Charge reviews the information on the On-Hold Recall sign, and signs and dates. The Compliance manager or Agents affixes the On-Hold Recall Sign to the container holding the recalled product, which then places it "on hold." While the product(s) are on hold, no other product will be stored within the safe



License Type: Dispensary

where “ON-Hold” is kept. The Applicant will reasonably strive to keep no on-hold product on site for more than calendar seven (7) days; however the applicant understands that the Department investigations may take longer than that allotted time. If a recall action or destruction action is not deemed necessary, then any required corrective action will be taken, and the product will be released by the Compliance Manager. The On-Hold Recall Sign is removed from the product and a release sign put on the product. The Applicant will strive to make sure all actions taken are documented accordingly and correspond with BioTrack processing. All recalled product, tampered with, damaged, expired, or returned product will be documented in BioTrack and will be destroyed in accordance with the Cannabis Tax Act and AMCC regulations. In accordance with the state of Alabama, Applicant will establish an account with the State's verification system that documents the disposal of cannabis, including: (i) a description of the products, including the quantity, strain, variety, batch number, and reason for the cannabis being disposed; (ii) the method of disposal; and (iii) the date and time of disposal. Destruction and disposal will be completed onsite by the agent in charge and will be filmed under camera surveillance. The following steps will be followed by an inventory agent in the presence of another agent in charge on camera in a designated waste destruction area. All destruction of cannabis products will be completed outside of operational hours. Agents will use the following tools for waste destruction: a blender, coffee grinder, soil, hammer or hot water heater. Agents should review the chart below to determine which destruction tool will be best to destroy the cannabis product.

**Destruction Tool Cannabis Product:**

Hammer - Cannabis Concentrates

Soil - Cannabis Flower, Cannabis Edibles, Cannabis Topicals

Coffee Grinder - Cannabis Flower, Cannabis Edibles, Cannabis Concentrates

Hot Water Heater - Cannabis Concentrates, Cannabis Topicals

Blender - Cannabis Edibles, Cannabis Flower

The Compliance Agent in Charge will inform the Department of Finance and Professional regulation, the Department of Agriculture, and the Department of Public

License Type: Dispensary  
Health, within 24 hours of discovering defective or suspected defective product of the recall action at and in writing to the Department within 24 hours of the recall action

**15.11 - Security Plan**

- **Provided at Exhibit 19**

## Exhibit 16 - Policies and Procedures Manual

### Summary

#### 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.

*Aretha Dix*

Printed Name of Verifying Individual

*Owner*

Title of Verifying Individual

*Aretha Q. Brown-Dix*

Signature of Verifying Individual

*28 Dec 2022*

Verification Date

**If Policies and Procedures Manual exceeds 25 pages, then a summary of the manual, not to exceed 5 pages, is required.**

Hours of Operation

The Dispensary will ensure that it is operating and available to dispense medical marijuana to qualifying patients and designated caregivers. The applicant anticipates the hours of operation for the facility to be as follows:

Monday - Friday            10:00 a.m. - 7:00 p.m. CT

Saturday                    10:00 a.m. - 10:00 p.m. CT

Sunday                      1:00 p.m. - 7:00 p.m. CT

Procedure: In order to ensure the above hours are observed, the Dispensary will ensure that it has sufficient staff available to open and run the Dispensary and sufficient medical marijuana and related products to dispense to qualifying patients and designated caregivers during business hours. The Dispensary reserves the right to limit the number of qualifying patients and designated caregivers allowed in the Dispensary building at a given time and further reserves the right to limit the amount of medical marijuana or related products that qualifying patients and designated caregivers can purchase in a given time period.

Training & Confidentiality

The Dispensary's General Manager will conduct in-person and hands-on training for all new employees upon hire and for all current employees no less than annually, within the Dispensary building. Such training will cover no less than 2 hours of instruction and will be documented with sign in and sign out sheets for every employee that indicate the time, date, place and substance of such training.

Inventory Control System

The Dispensary's inventory control system, known as BioTrack, is an internet-based comprehensive medical marijuana inventory and sales tracking system that is guaranteed to comply with all State of Alabama laws and AMCC regulations pertaining to the

cultivation, processing, tracking, identification, transfer, transportation and sale of medical marijuana.

#### Methods of Acquiring Medical Marijuana

The Dispensary will acquire medical marijuana from regulated cultivation sites authorized by the AMCC to cultivate marijuana (approximately 3 to 6 months after the Dispensary's opening). The Dispensary will not acquire medical marijuana from any other source.

#### Audits

The Dispensary's General Manager will have oversight of the Dispensary's inventory control and will conduct and document an audit of the Dispensary's inventory that is accounted for according to generally accepted accounting principles at least once every 30 calendar days.

#### Qualifying Patient Records

##### Establishing and Maintaining Records

The Dispensary has contracted with and will utilize at all times a comprehensive internet-based medical marijuana patient record system known as BioTrack. The Dispensary will ensure that a qualifying patient record is established and maintained for each qualifying patient who obtains medical marijuana from the dispensary.

#### Records

The Dispensary will ensure that a qualifying patient record is established and maintained for each qualifying patient who obtains medical marijuana from the dispensary.

#### Denials of Sale

In the event of any denial of sale or refusal to provide medical marijuana by the Dispensary to a qualifying patient or a qualifying patient's designated caregiver, the Dispensary will require that a Denial of Sale Form is completed for such qualifying patient or designated caregiver.

### Agent Responsibilities

Before dispensing medical marijuana to a qualifying patient or designated caregiver and through the use of the Electronic Verification System, the Dispensary's dispensary agent will verify the qualifying patient's or designated caregiver's identity, verify that the qualifying patient or designated caregiver is in immediate possession of a valid registry identification card.

### Patient Education & Support

The Dispensary will develop and distribute patient education materials that have been created and developed by the Dispensary's Lead Certified Dispenser.

The Dispensary has developed a system for a qualifying patient or the qualifying patient's designated caregiver to document the qualifying patient's pain, cachexia or wasting syndrome, nausea, seizures, muscle spasms, or agitation.

### Policy & Procedure Review

The Dispensary will review its policies and procedures at least once every 12 months from the issue date of its dispensary registration certificate and update as needed.

### Cleaning and Sanitation

#### Maintenance of Dispensary Building and Equipment

The Dispensary will ensure that any building or equipment used by the Dispensary for the preparation, packaging, storage, or sale of medical marijuana is maintained in a clean and sanitary condition.

### Protection of Medical Marijuana

The Dispensary will ensure that medical marijuana in the process of production, preparation, manufacture, packing, storage, sale, distribution, or transportation is protected from flies, dust, dirt, and all other contamination.

### Removal of Refuse or Waste

Exhibit 19: Policies and Procedures Summary

The Dispensary will ensure that refuse or waste products incident to the manufacture, preparation, packing, selling, distributing, or transportation of medical marijuana are removed from the buildings used as a dispensary once every 24 hours or more often as necessary to maintain a clean condition.

The General Manager will periodically check with dispensary agents within the Dispensary building to verify that dispensary agents have their registry identification cards in their immediate possession.

### Security

**Authorized Access** - The Dispensary will restrict access to the areas of the Dispensary that contain marijuana and if applicable, the Dispensary's cultivation site, to authorized individuals only. No persons under the age of 21 are allowed into the body of the Dispensary, not including the waiting room.

### Unauthorized Access

To prevent unauthorized access to medical marijuana at the Dispensary, the Dispensary has security equipment to deter and prevent unauthorized entrance into limited access areas.

### Identification

The Dispensary will provide for the accurate and continuous identification of individuals authorized to enter the Dispensary.

### Electronic Monitoring

The Dispensary will conduct electronic monitoring both in and around its Dispensary building. The Dispensary will conduct electronic video monitoring of all visitors in the parking lot and in the entry area of the Dispensary building.

## 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.

*Aretha Dix*  
Printed Name of Verifying Individual

*owner*  
Title of Verifying Individual

*Aretha Q. Brown-Dix*  
Signature of Verifying Individual

*28 Dec 2022*  
Verification Date



## **Applicant Dispensary**

### Hours of Operation

The Dispensary will ensure that it is operating and available to dispense medical marijuana to qualifying patients and designated caregivers. The applicant anticipates the hours of operation for the facility to be as follows:

Monday - Friday            10:00 a.m. - 7:00 p.m. CT

Saturday                    10:00 a.m. - 10:00 p.m. CT

Sunday                      1:00 p.m. - 7:00 p.m. CT

Procedure: In order to ensure the above hours are observed, the Dispensary will ensure that it has sufficient staff available to open and run the Dispensary and sufficient medical marijuana and related products to dispense to qualifying patients and designated caregivers during business hours. The Dispensary reserves the right to limit the number of qualifying patients and designated caregivers allowed in the Dispensary building at a given time and further reserves the right to limit the amount of medical marijuana or related products that qualifying patients and designated caregivers can purchase in a given time period.

### Job Descriptions and Employment Contracts

#### Job Descriptions

Job Descriptions of all positions within the Dispensary. Each description includes a more detailed description of the Personnel Duties and Responsibilities, Authority, and

Qualifications of each position. Those positions include:

- a. Greeter
- b. Receptionist
- c. Safety Escort
- d. Patient Assistant/Counselor (Teller)
- e. Certified Dispenser/Counselor
- f. Compliance Agent
- g. General Manager

### Personnel Supervision

The Dispensary's General Manager is responsible for all employee supervision. There will be no intermediary supervisors, consequently, all Dispensary employees will report directly to the General Manager.

### Training & Confidentiality

The Dispensary's General Manager will conduct in-person and hands-on training for all new employees upon hire and for all current employees no less than annually, within the Dispensary building. Such training will cover no less than 2 hours of instruction and will be documented with sign in and sign out sheets for every employee that indicate the time, date, place and substance of such training. Training topics conducted by the General Manager will include:

- h. Employee Handbook and Job Descriptions
- i. Employment Laws and Employee Rights
- j. Dispensary Operations and Administration
- k. Qualified Patient Records and Information and Confidentiality Requirements Pertaining to such Records and Information
- l. Business Records and Retention of such Records
- m. Inventory Control and Product Labeling
- n. Dispensary Security

The Dispensary's Lead Certified Dispenser will conduct in-person and hands-on training for all new employees upon hire and for all current employees no less than annually, within the Dispensary building. Such training will cover no less than 4 hours of instruction and will be documented with sign in and sign out sheets for every employee that indicate the time, date, place and substance of such training. The training will focus on company policies and compliance based on the AAMC. Training topics conducted will include:

- a. A description of the potential for differing strengths of medical marijuana strains, terpenes and products
- b. Information about potential drug-to-drug interactions, including interactions with alcohol, prescription drugs, non-prescription drugs, and supplements

- c. Techniques for the use of medical marijuana and marijuana paraphernalia
- d. Information about different methods, forms, and routes of medical marijuana administration
- e. Information about different methods, forms, and routes of medical marijuana administration
- f. Signs and symptoms of substance abuse, including tolerance, dependency, and withdrawal
- g. A listing of substance abuse programs and referral information
- h. Determining and reporting adverse health conditions in qualified patients

#### Performance Evaluations

The Dispensary's General Manager will conduct in-person employee performance evaluations for all new employees after 12 months of employment and for all current employees no less than annually, within the Dispensary building. Performance evaluations will be recorded on the Employee Performance.

#### Disciplinary Actions

The Dispensary's General Manager will be responsible for taking disciplinary actions against any employee. Disciplinary action will be documented by the General Manager according to the requirements of the dispensary guidelines outlined in the employee handbook.

#### Employment Contracts

The Dispensary will not utilize written employment contracts with any of its employees. All of the Dispensary's employees will be employed under verbal at-will contracts, subject to the terms and conditions of the Employee Handbook.

## Records

The Dispensary's business records shall be created, stored, maintained and retained by the Dispensary in accordance with all rules and regulations promulgated by the AMCC, the Alabama Legislature, and applicable City and County Ordinances, as well as any other applicable rules, regulations and laws. The Dispensary will maintain business records according to the requirements of the Dispensary's Document Retention Policy within the employee handbook. Maintained business records will include, but not be limited to the following items:

- a. Corporate Records
- b. Accounting and Financial Records
- c. Correspondence and Internal Memoranda
- d. Electronic Documents
- e. Legal Files and Papers
- f. Insurance Records
- g. Payroll Documents
- h. Personnel Records
- i. Property Records
- j. Tax Records
- k. Contribution Records
- l. Grant-Making Records
- m. Media/Marketing Materials
- n. Miscellaneous Records

## Retention

### Method(s)

The method of the Dispensary's business record retention will depend on the type of business record to be retained.

### Time-Frame

The time-frame of the Dispensary's business record retention will depend on the type of business record to be retained.

## 1. Disposal of Unusable Marijuana

The Dispensary will establish and implement an inventory control system for the Dispensary's medical marijuana that documents the disposal of medical marijuana that is not usable marijuana. The Dispensary will require the use of the Medical Marijuana Disposal Form to document any such disposal.

The Dispensary has contracted with and will utilize at all times a comprehensive internet-based medical marijuana inventory control system known as BioTrack.

### Inventory Control System

The Dispensary's inventory control system, known as BioTrack, is an internet-based comprehensive medical marijuana inventory and sales tracking system that is guaranteed to comply with all State of Alabama laws and AMCC regulations pertaining to the cultivation, processing, tracking, identification, transfer, transportation and sale of medical marijuana. The inventory control system is both Qualified Patient and Dispensary focused, allowing for:

- a. Tracking of every cannabis plant, nutrient, watt, drop and yield within the Dispensary or its origin of cultivation site
- b. Tracking of every medical cannabis plant from seed to harvest
- c. Tracking of nutrients, schedules, yields, environmental variables supplied through vendor records
- d. Capture of historical data and test results
- e. Provision of batch and plant tracking
- f. Creation of State-approved dispatch and trip plans
- g. Tracking of shake, spillage, evaporation, edibles and any theft

The Dispensary will document each day's beginning inventory, acquisitions, harvests, sales, disbursements, disposal of unusable marijuana, and ending inventory by requiring its dispensary agents to input all such information into the BioTrack inventory control system on a daily basis. The Dispensary's dispensary agents will also be required to input into the BioTrack inventory control system, on a daily basis, all information pertaining to:

Acquiring medical marijuana from a licensed cultivator or processor

Each batch of marijuana being disposed of including, if applicable, the number of any failed or unusable plants; the date of disposal; the method of disposal; the name and registry identification number of the dispensary agent responsible for the disposal. With regard to the method of disposal of unusable marijuana, the Dispensary will engage a multi-step process for doing so, including the following steps: 1) physically grind up any unusable marijuana, including plant waste; 2) mix the ground up unusable marijuana with non-marijuana grow materials and media in proportions that ensure any such unusable marijuana is not identifiable within, and not retrievable from, the non-marijuana grow material and media; and 3) dispose of the resulting mixture in an acceptable manner for organic plant waste, in compliance with all applicable laws and rules of any state, county or local government. In order to carry out this disposal process, the Dispensary site will use a commercial-grade plant matter grinding and mixing compost machine.

#### Designated Dispensary Agent

The Dispensary's General Manager will have oversight of, and maintain, the Dispensary's medical marijuana inventory control system.

#### Methods of Acquiring Medical Marijuana

The Dispensary will acquire medical marijuana from regulated cultivation sites authorized by the AMCC to cultivate marijuana (approximately 3 to 6 months after the Dispensary's opening). The Dispensary will not acquire medical marijuana from any other source.

Procedure: The Dispensary will follow the methods listed below in the event of any acquisition or provision of medical marijuana or related products by the Dispensary:

- a. Acquiring medical marijuana from authorized cultivation site:

After approval by the Dispensary's General Manager, all such acquisitions will take place either within the Dispensary building by physical delivery from a dispensary agent of cultivar. If and only if, acquired by one of the Dispensary's dispensary agents and documented by a trip plan as required by the AMCC regulations. The Dispensary's General Manager will inspect and approve or reject all deliveries of medical marijuana into the Dispensary's building. The Dispensary will utilize its identifying METRC number to document its acquisition of medical marijuana from a dispensary agent of the cultivar and

will input all required information into BioTrack. Upon receiving any medical marijuana into the Dispensary building and accepting such acquisition. The required information to be input by a dispensary agent upon any acquisition will include:

- A description of the medical marijuana acquired including the amount, strain, and batch number
- The name and registry identification number of the dispensary and dispensary agent who provided the medical marijuana
- The name and registry identification number of the dispensary agent receiving the medical marijuana on behalf of the dispensary
- The date of acquisition.

### Packaging

For all medical marijuana provided by the Dispensary to a qualifying patient or a designated caregiver, the Dispensary will ensure that such medical marijuana is labeled with:

- The Dispensary's registry identification number
- The amount, strain, and batch number of medical marijuana
- The following statement "ALABAMA DEPARTMENT OF HEALTH SERVICES' WARNING: KEEP MARIJUANA OUT OF REACH OF CHILDREN AND ANY UNAUTHORIZED INDIVIDUAL"
- The date of manufacture, harvest, or sale
- The registry identification number of the qualifying patient.
  - a. For all medical marijuana provided by the Dispensary to another
  - b. For all medical marijuana within an edible food product or tablet provided by the Dispensary to a qualifying patient or a designated caregiver, the Dispensary will ensure that such food product is labeled with:
    - The Dispensary's registry identification number
    - The amount, strain, and batch number of medical marijuana within the food product

- The following statement "KEEP MARIJUANA OUT OF REACH OF CHILDREN AND ANY UNAUTHORIZED INDIVIDUAL"
- The date of manufacture, harvest, or sale
- A list of all chemical additives, including non organic pesticides, herbicides, and fertilizers, used in the cultivation and production of the medical marijuana
- The registry identification number of the qualifying patient
- The total weight of the edible food product.

### Audits

The Dispensary's General Manager will have oversight of the Dispensary's inventory control and will conduct and document an audit of the Dispensary's inventory that is accounted for according to generally accepted accounting principles at least once every 30 calendar days. The Dispensary's General Manager will perform any audit by using reports generated from the BioTrack inventory control system that indicate the Dispensary's current inventory and comparing such reports to the Dispensary's actual physical inventory, which the General Manager will tally by physically counting the inventory and manually recording the totals. If a periodic inventory audit identifies a reduction in the amount of medical marijuana in the Dispensary's inventory not due to documented causes, the General Manager will determine where the loss occurred and take and document corrective action using the Loss or Theft Report Form. If any reduction in the amount of medical marijuana in the Dispensary's inventory is due to suspected criminal activity by a dispensary agent, the Dispensary will report the dispensary agent to the AMCC and to local law enforcement authorities and take and document corrective action using the Loss or Theft Report Form.

### Inventory Records Retention

The Dispensary will maintain the inventory control documentation and records described above at the Dispensary in compliance with the Dispensary's Document Retention Policy for at least five years from the date on the inventory control document, and upon request, provide the required inventory control documentation to the AMCC for review in either Exhibit 16 - Policies and Procedures Manual



electronic or print format. The Dispensary's inventory control documentation and records will include all categories of documents listed in Section II (Accounting and Financial Records) of the Dispensary's Document Retention Policy and will be stored both within the Dispensary's electronic servers and the internet-based BioTrack inventory control system.

### Qualifying Patient Records

#### Establishing and Maintaining Records

The Dispensary has contracted with and will utilize at all times a comprehensive internet-based medical marijuana patient record system known as BioTrack. The Dispensary will ensure that a qualifying patient record is established and maintained for each qualifying patient who obtains medical marijuana from the dispensary.

#### Authorizations

The Dispensary will ensure each of the following requirements in the event that a qualifying patient record is made or an entry in an existing qualifying patient record is made:

- Qualifying patient record is recorded only by a dispensary agent authorized by Dispensary policies and procedures to make an entry
- Qualifying patient record is dated and signed (electronically) by the dispensary agent
- Qualifying patient record includes the dispensary agent's registry identification number
- Qualifying patient record is not changed to make the initial entry illegible

#### Electronic Records – Limitations

The Dispensary will ensure that a qualifying patient record is only accessed by a dispensary agent authorized by dispensary policies and procedures to access the qualifying patient record. This is accomplished through the BioTrack system by electronically restricting the access to qualifying patient records on the BioTrack system to certain authorized dispensary agents. The Dispensary will ensure that for all electronic signatures used to sign an entry in the Biotrack system, the dispensary agent whose signature the electronic code

represents is accountable for the use of the electronic signature. The Dispensary's General Manager will ensure that all dispensary agents are signed in to the BioTrack system under the login and electronic signature that has been specifically set up for each dispensary agent. Such login and electronic signatures will be protected by a password known only to the dispensary agent. Dispensary agents are expressly prohibited from using any login or electronic signature of any other dispensary agent, or from using a computer terminal that has been logged into by another dispensary agent. All infractions of this prohibition will be subject to the Dispensary's Progressive Discipline Policy.

### Records

The Dispensary will ensure that a qualifying patient record is established and maintained for each qualifying patient who obtains medical marijuana from the dispensary. The Dispensary will utilize BioTrack to create and maintain qualifying patient records. The Dispensary will maintain qualifying patient records electronically within the BioTrack system, and therefore the Dispensary shall ensure that there are adequate safeguards to prevent unauthorized access, and that the date and time of an entry in a qualifying patient record is recorded electronically by an internal clock.

### Patient Information

The Dispensary shall ensure that the qualifying patient record for a qualifying patient who requests or whose designated caregiver on behalf of the qualifying patient requests medical marijuana from the Dispensary contains qualifying patient information that includes, at a minimum:

- The qualifying patient's name
- The qualifying patient's date of birth
- The name of the qualifying patient's designated caregiver, if applicable

Procedure: After approved entry into the Dispensary building and at the time a qualifying patient requests, or whose designated caregiver on behalf of the qualifying patient requests, medical marijuana from the Dispensary, a dispensary agent of the Dispensary will electronically access the BioTrack qualifying patient record system using the dispensary agent's particular login credentials. The dispensary agent will verbally ask the qualifying

patient or designated caregiver to provide the required information listed above. The dispensary agent will then input the provided information into the system according to the prompts and blanks within the BioTrack system and thereby create a qualifying patient record. Due to the electronic nature of the BioTrack system, there is no printed or hard copy form of a qualifying patient record.

#### Education & Support Materials Provided

The Dispensary's qualifying patient record system, BioTrack, requires that the qualifying patient record for a qualifying patient who requests or whose designated caregiver on behalf of the qualifying patient requests medical marijuana from the dispensary contains documentation of any patient education and support materials provided to the qualifying patient or the qualifying patient's designated caregiver, including a description of the materials and the date the materials were provided or offered. Within the qualifying patient record in the BioTrack system on each occasion that a qualifying patient record is created, a dispensary agent will input that patient education and support materials were offered to the qualifying patient or the qualifying patient's designated caregiver, whether such materials were accepted, and if so, a description of the materials and the date on which the materials were accepted.

#### Denials of Sale

In the event of any denial of sale or refusal to provide medical marijuana by the Dispensary to a qualifying patient or a qualifying patient's designated caregiver, the Dispensary will require that a Denial of Sale Form is completed for such qualifying patient or designated caregiver which contains, at a minimum:

- The date of any denial of sale or refusal to provide medical marijuana
- The name and registry identification number of the individual who requested the medical marijuana
- The Dispensary's reason for refusing to provide the medical marijuana for each time the qualifying patient requests and does not obtain medical marijuana or, if applicable, the designated caregiver requests on behalf of the

qualifying patient and does not obtain medical marijuana from the  
Dispensary

The Dispensary will also require that the qualifying patient record system, BioTrack, is updated to include the denial of sale event. Within the Denial of Sale Form and/or the qualifying patient record in the BioTrack system on each occasion that any denial of sale or refusal to provide medical marijuana occurs, a dispensary agent will input the above information pertaining to any denial of sale or refusal to provide medical marijuana.

Delivery Method (if applicable)

In addition to obtaining medical marijuana from the Dispensary building, a qualifying patient or a qualifying patient's designated caregiver may be eligible to receive medical marijuana by way of delivery from the Dispensary through a dispensary agent. In such instances, immediately upon return of the dispensary agent to the Dispensary building after delivery of the medical marijuana, the dispensary agent shall input into the BioTrack system all of the information required, as well as a notation into the qualifying patient record within the BioTrack system that the qualified patient or designated caregiver obtained the medical marijuana by way of delivery from the Dispensary through a dispensary agent. In conducting any such delivery, the dispensary agent will comply with all AMCC regulations pertaining to the transportation of medical marijuana, including the completion of a trip plan.

Confidentiality

The Dispensary will ensure qualified patient records are be protected from loss, damage, and/or unauthorized use by following the requirements of the state of Alabama, and "HIPPA" regulations by maintaining qualifying patient records securely, within the internet-based BioTrack system, thereby ensuring that there are adequate safeguards to prevent unauthorized access, and that the date and time of an entry in a qualifying patient record is recorded electronically by an internal clock.

a. Retention

The Dispensary will maintain a qualifying patient record described above at the Dispensary in compliance with the Dispensary's Document Retention Policy for at least five years from Exhibit 16 - Policies and Procedures Manual

the date of the qualifying patient's or, if applicable, the qualifying patient's designated caregiver's last request for medical marijuana from the dispensary, and upon request, provide the required qualifying patient record to the AMCC for review in either electronic or print format. The Dispensary's qualifying patient records will be stored both within the Dispensary's electronic servers and the internet-based BioTrack inventory control system.

#### Dispensing Medical Marijuana

The dispensary will use two methods to dispense medical marijuana to qualified patients and designated caregivers. The predominant method of dispensing will be by way of a sale transaction within the Dispensary building. The second method of dispensing will be by way of a sale transaction occurring through a delivery of medical marijuana directly to qualified patients and designated caregivers by a dispensary agent so authorized. Both such methods will occur only after the requirements of AMCC have been met.

#### Agent Responsibilities

Before dispensing medical marijuana to a qualifying patient or designated caregiver and through the use of the Electronic Verification System, the Dispensary's dispensary agent will verify the qualifying patient's or designated caregiver's identity, verify that the qualifying patient or designated caregiver is in immediate possession of a valid registry identification card, offer any appropriate patient education or support materials and verify that the amount of medical marijuana the qualifying patient or designated caregiver is requesting would not cause the qualifying patient to exceed the limit set according to the AMCC guidelines. If the Dispensary's dispensary agent is unable to complete any of the above requirements, the dispensary agent will terminate the transaction and refuse to dispense any medical marijuana. The dispensary agent will then complete a Denial of Sale Form.

Procedure: After approved entry into the Dispensary building by a qualifying patient or designated caregiver, a dispensary agent of the Dispensary will electronically access the Electronic Verification System using the dispensary agent's particular login credentials. Upon completing the verification/education requirements listed above, the dispensary agent will transact the sale and dispense the requested medical marijuana. The dispensary

agent will require a qualifying patient or designated caregiver to first present payment for the specific amount of medical marijuana. Thereafter the dispensary agent will dispense the specific amount of medical marijuana. Upon completion of the sale transaction, the dispensary agent will update both the Electronic Verification System and the BioTrack system to reflect the sale transaction, including the amount and date.

#### Electronic Verification System (BioTrack Point of Sale System)

Before dispensing medical marijuana to a qualifying patient or designated caregiver, the dispensary agent will enter the qualifying patient's or designated caregiver's registry identification number on the qualifying patient's or designated caregiver's registry identification card into the medical marijuana Electronic Verification System and verify the validity of the qualifying patient's or designated caregiver's registry identification card. In doing so, the dispensary agent will manually input the qualifying patient's or designated caregiver's registry identification card number into the medical marijuana Electronic Verification System. The dispensary agent will not use any form of cut and paste electronic function to input the qualifying patient's or designated caregiver's registry identification card number into the medical marijuana Electronic Verification System. Thereafter, immediately after dispensing any medical marijuana, the dispensary agent will enter the following information into the medical marijuana Electronic Verification System for the qualifying patient or designated caregiver:

- a. The amount of medical marijuana dispensed
- b. Whether the medical marijuana was dispensed to the qualifying patient or to the qualifying patient's designated caregiver
- c. The date and time the medical marijuana was dispensed
- d. The dispensary agent's registry identification number
- e. The dispensary's registry identification number

#### Denial of Sale

The Dispensary's dispensary agents are required to deny the sale of medical marijuana to a qualified patient or designated caregiver in the following events:

- a. The dispensary agent cannot verify the qualifying patient's or designated caregiver's identity or verifies that the evidence of identity being presented is not actual or is fraudulent
- b. The dispensary agent verifies that the amount of medical marijuana the qualifying patient or designated caregiver is requesting would cause the qualifying patient to exceed the limit set by the AMCC.
- c. The dispensary agent cannot verify the validity of the qualifying patient's or designated caregiver's registry identification card
- d. The qualifying patient or designated caregiver appears to be impaired or abusing medical marijuana.

Procedure: Step one: The dispensary agent will request that a qualified patient or designated caregiver provide his or her Department-issued registry identification card and a second form of picture ID. The dispensary agent will first verify that the two forms of identity match, and then compare those two forms of identity to the person providing them. If the forms of identity do not match, or the forms of identity match, but do not appear to be forms of identity that belong to the person providing them, the dispensary agent will deny any sale of medical marijuana to that person. Step two: the dispensary agent will access the Electronic Verification System and verify the validity of the qualifying patient's or designated caregiver's registry identification card. If the dispensary agent cannot verify the validity of the qualifying patient's or designated caregiver's registry identification card, the dispensary agent will deny any sale of medical marijuana to that person. Step three: the dispensary agent will verify the amount of medical marijuana the qualifying patient or designated caregiver is requesting would not cause the qualifying patient to exceed the limit according to the AMCC regulations. If the amount of medical marijuana the qualifying patient or designated caregiver is requesting would cause the qualifying patient to exceed the limit, the dispensary agent will deny the sale of medical marijuana to that person to the degree that any sale would cause the qualifying patient to exceed the limit. Step four: If at any time during any interaction with an individual attempting to purchase medical marijuana the dispensary agent determines that the qualifying patient or designated caregiver appears to be impaired or abusing medical marijuana, the dispensary agent will

deny any sale of medical marijuana to that person. In any denial of sale event, the dispensary agent will complete a Denial of Sale Form.

#### Patient Education & Support

The Dispensary will develop and distribute patient education materials that have been created and developed by the Dispensary's Lead Certified Dispenser. On a continuing basis, but no less than once annually, the Lead Certified Dispenser will update, review and revise the Dispensary's patient education materials to incorporate new medical findings with regard to medical marijuana and any feedback and suggestions from the Dispensary's dispensary agents and the qualifying patients and designated caregivers purchasing medical marijuana from the Dispensary.

#### Development

The Dispensary will ensure that the education materials distributed to qualified patients and designated patient caregivers include, at a minimum:

1. Availability & Effects of Different Strains of Marijuana
2. Methods, Forms, and Routes of Administration
3. Prohibition on the Smoking of Medical Marijuana in Public Places
4. Alternative Medical Options
5. Information About Possible Side-Effects of and Contraindications of Marijuana Use (including possible impairment with use and operation of motor vehicles or heavy machinery; caring for children; or job performance)
6. Information about potential drug-to-drug interactions to include alcohol, prescription drugs, non-prescription drugs, and supplements
7. Techniques for the use of medical marijuana and marijuana paraphernalia
8. Signs and Symptoms of Substance Abuse to include tolerance, dependency, and withdrawal
9. A List of Substance Abuse Programs and Referral Information

#### Distribution



Among the requirements of a dispensary agent dispensing medical marijuana is the requirement that the dispensary agent offer patient education and support materials to every qualifying patient or designated caregiver requesting medical marijuana. The Dispensary will distribute education and support materials through its dispensary agents at the time of any dispensing of medical marijuana and will track through the BioTrack system when a qualifying patient or designated caregiver accepts or denies such materials.

#### Documentation

The Dispensary's qualifying patient record system, BioTrack, requires that the qualifying patient record for a qualifying patient who requests or whose designated caregiver on behalf of the qualifying patient requests medical marijuana from the dispensary contains documentation of any patient education and support materials provided to the qualifying patient or the qualifying patient's designated caregiver, including a description of the materials and the date the materials were provided or offered. Within the qualifying patient record in the BioTrack system on each occasion that a qualifying patient record is created, a dispensary agent will input that patient education and support materials were offered to the qualifying patient or the qualifying patient's designated caregiver, whether such materials were accepted, and if so, a description of the materials and the date on which the materials were accepted.

#### Tracking Effects

The Dispensary has developed a system for a qualifying patient or the qualifying patient's designated caregiver to document the qualifying patient's pain, cachexia or wasting syndrome, nausea, seizures, muscle spasms, or agitation that includes:

- A log book, maintained by the qualifying patient and or the qualifying patient's designated caregiver, in which the qualifying patient or the qualifying patient's designated caregiver may track the use and effects of specific medical marijuana strains and products
- A rating scale for pain, cachexia or wasting syndrome, nausea, seizures, muscles spasms, and agitation

- Guidelines for the qualifying patient's self-assessment or, if applicable, assessment of the qualifying patient by the qualifying patient's designated caregiver
- Guidelines for reporting usage and symptoms to the physician providing the written certification for medical marijuana and any other treating physicians

## General

### Posting of Required Information

The Dispensary will post the following information in a place that can be viewed by the individuals entering the Dispensary:

- If applicable, the Dispensary's approval to operate;
- The Dispensary's registration certificate;
- The name of the Dispensary's General Manager and the General Managers phone number on a sign at least 20 centimeters by 30 centimeters.
- The hours of operation during which the Dispensary will dispense medical marijuana to qualifying patients or a designated caregiver.

The General Manager shall ensure that this posting is in place at all times during the Dispensary's operating hours.

### Adequate Consideration for Purchase of Property

The Dispensary will not purchase property for more than adequate consideration in money or cash equivalent. In any situation where the Dispensary purchases property, it will adequately document the sufficient value it received in return for any such property. Any such purchasing of property will be submitted to the Dispensary's Board of Directors for review and approval.

### Adequate Consideration for Payment of Wages or Personal Services

The Dispensary will not pay compensation for salaries or other compensation for personal services that is in excess of a reasonable allowance. In any situation where the Dispensary pays for wages or personal services, it will adequately document the sufficient value it

received in return for such payments. The Dispensary's General Manager will oversee the payment of compensation for salaries or other compensation for personal services by the Dispensary, and ensure all such payments are reasonable under the given circumstances.

#### Sale of Dispensary Property for Adequate Consideration

The Dispensary will not sell any part of the Dispensary's property or equipment for less than adequate consideration in money or cash equivalent. In any situation where the Dispensary sells property, it will adequately document the sufficient value it received in return for any such property. Any such selling of property will be submitted to the Dispensary's Board of Directors for review and approval.

#### Diversion of Dispensary Income or Property

The Dispensary will not engage in any other transaction that results in a substantial diversion of the dispensary's income or property. In any transaction in which the Dispensary is involved, it will adequately document the substantial and valuable consideration on both sides of the transaction so as to avoid substantial diversion. In any event where a Dispensary transaction involves significant assets of the Dispensary, the transaction will be submitted to the Dispensary's Board of Directors for review and approval.

#### Policy & Procedure Review

The Dispensary will review its policies and procedures at least once every 12 months from the issue date of its dispensary registration certificate and update as needed. The Dispensary will ensure that all policies and procedures maintained for inspection are the most recent versions with all revisions incorporated therein. The Dispensary will use the Policies and Procedures Review Log, which will be kept in a binder containing all Dispensary policies and procedures in hard copy, available for inspection in the reception area of the Dispensary building in order to ensure timely review of its policies and procedures.

#### Cleaning and Sanitation

Exhibit 16 - Policies and Procedures Manual

#### Maintenance of Dispensary Building and Equipment

The Dispensary will ensure that any building or equipment used by the Dispensary for the preparation, packaging, storage, or sale of medical marijuana is maintained in a clean and sanitary condition. The Dispensary will maintain and enforce a routine cleaning schedule to ensure that the building and all equipment is maintained in a clean and sanitary condition.

#### Protection of Medical Marijuana

The Dispensary will ensure that medical marijuana in the process of production, preparation, manufacture, packing, storage, sale, distribution, or transportation is protected from flies, dust, dirt, and all other contamination. In addition to the use of sealed containers, the Dispensary will routinely test samples of medical marijuana in its possession for any contaminants listed above. In the event any such contaminants are detected, the medical marijuana will be disposed of in accordance to the policies and procedures herein.

#### Removal of Refuse or Waste

The Dispensary will ensure that refuse or waste products incident to the manufacture, preparation, packing, selling, distributing, or transportation of medical marijuana are removed from the buildings used as a dispensary once every 24 hours or more often as necessary to maintain a clean condition. The Dispensary will develop and implement a plan for removal of refuse and waste. The Dispensary will ensure that various dispensary agents will share the responsibility of removing refuse or waste each night before closing, and when necessary. Medical marijuana remnants or by-products shall be disposed of according to an approved plan and not placed within the facility's exterior refuse container.

#### Cleaning of Equipment

The Dispensary will ensure that all trucks, trays, buckets, other receptacles, platforms, racks, tables, shelves, knives, saws, cleavers, other utensils, or the machinery used in moving, handling, cutting, chopping, mixing, packaging, or other processes are cleaned

daily. The Dispensary will ensure that various dispensary agents will share the responsibility of cleaning equipment each night before closing, and when necessary.

#### Protection of Edibles

The Dispensary will ensure that, if applicable, all edible foods are securely covered. The Dispensary will ensure that all edibles are properly packaged and kept in a secure manner to prevent airborne or contact contamination.

#### Dispensary Agent Hand Cleansing

The Dispensary will ensure that while in the Dispensary or the Dispensary's cultivation site, a dispensary agent will clean the dispensary agent's hands and exposed portions of the dispensary agent's arms in a hand washing sink:

- Before preparing medical marijuana including working with food, equipment, and utensils;
- During preparation, as often as necessary to remove soil and contamination and to prevent cross-contamination when changing tasks;
- After handling soiled equipment or utensils;
- After touching bare human body parts other than the dispensary agent's clean hands and exposed portions of arms; and
- After using the toilet room.

#### Dispensary Agent Hygiene

The Dispensary will ensure that while in the Dispensary, a dispensary agent will:

- Keep the dispensary agent's fingernails trimmed, filed, and maintained so that the edges and surfaces are cleanable;
- Unless wearing intact gloves in good repair, not have fingernail polish or artificial fingernails on the dispensary agent's fingernails; and
- Wear protective apparel such as coats, aprons, gowns, or gloves to prevent contamination were determined as needed.

The Dispensary will ensure that while in the Dispensary, a dispensary agent will wear clean clothing appropriate to assigned tasks. The Dispensary will issue two shirts to all dispensary agents.

#### Reporting of Adverse Health Conditions

The Dispensary will ensure that while in the Dispensary, a dispensary agent will report to the general manager any health condition experienced by the dispensary agent that may adversely affect the safety or quality of any medical marijuana with which the dispensary agent may come into contact. The Dispensary will ensure that all dispensary agents receive appropriate training regarding reporting adverse health conditions to the medical director and that the policy regarding reporting is enforced.

#### Determination of Adverse Health Condition

If the Dispensary's general manager determines that a dispensary agent has a health condition that may adversely affect the safety or quality of the medical marijuana, the Dispensary will prohibit the dispensary agent from direct contact with any medical marijuana until the general manager determines that the dispensary agent's health condition will not adversely affect the medical marijuana. The Dispensary will ensure that all dispensary agents receive appropriate training regarding reporting adverse health conditions to the general manager and that the policy regarding reporting is enforced. The General manager will be in frequent communication with the Certified Lead Dispenser to assess whether any adverse health conditions may exist.

#### Dispensary Agent Registry Identification Card and Requirements

##### Possession of Dispensary Agent Registry Identification Card

The Dispensary will ensure that each dispensary agent has the dispensary agent's registry identification card in the dispensary agent's immediate possession when the dispensary agent:

- Is working or providing volunteer services at the Dispensary or the Dispensary's cultivation site, or
- Is transporting marijuana for the Dispensary.

Procedure: No dispensary agent shall enter the Dispensary building without first showing his/her dispensary agent registry identification card to the dispensary agent overseeing access and proving that he/she is in actual possession of the registry identification card. The General Manager will periodically check with dispensary agents within the Dispensary building to verify that dispensary agents have their registry identification cards in their immediate possession.

#### Dispensary Agent Accompaniment

The Dispensary will ensure that a dispensary agent accompanies any individual other than another dispensary agent associated with the dispensary when the individual is present in the enclosed, locked facility where marijuana is dispensed by the dispensary.

Procedure: Access to the Dispensary by individuals other than dispensary agents shall be supervised by the General Manager according to the following:

- a. The General Manager must approve the entrance of any individual other than an authorized dispensary agent into the cultivation site.
- b. Upon approval by the General Manager, an individual will be required to sign a logbook registering both the time in and the time out of the cultivation site.
- c. The General Manager will assign a dispensary agent to accompany the individual at all times that the individual is within the cultivation site.
- d. The dispensary agent assigned to accompany the individual will also register the accompaniment in the logbook. The accompanying dispensary agent shall be with the individual at all times.
- e. The General Manager will ensure that upon exiting the cultivation site, an accompanied individual will not have removed any medical marijuana or related products from the cultivation site.

#### Dispensary Agent Registry Identification Card Requirement

The Dispensary will not allow an individual who does not possess a dispensary agent registry identification card issued under the Dispensary's registration certificate to:

- Serve as a principal officer or board member for the Dispensary;
- Serve as the medical director for the Dispensary;

- Be employed by the Dispensary; or
- Provide volunteer services at or on behalf of the Dispensary.

Procedure: Prior to opening, the Dispensary will ensure that all above-listed individuals have received a dispensary agent registry identification card. Any above-listed individual that does not obtain such a card will not be permitted to: be in the Dispensary building, serve as a principal officer or board member for the Dispensary, or be employed by or allowed to perform volunteer services for the Dispensary.

#### Notice of Dispensary Agent Termination

The Dispensary will provide written notice to the AMCC, including the date of the event within ten working days after the date, when a dispensary agent no longer:

- Serves as a principal officer or board member for the Dispensary;
- Is employed by the Dispensary; or
- Provides volunteer services at or on behalf of the Dispensary.

Procedure: The Dispensary will maintain an automatic notification system for renewals of registry identification cards and ensure that all renewals are achieved prior to the expiration of any registry identification card for any of the individuals listed above. In the event that a dispensary agent changes status as described above, the Dispensary will ensure that the AMCC is immediately notified and it shall be the responsibility of the Dispensary's General Manager to do so.

#### Physical Plant and Statutory Requirements of Dispensary Location

##### 1. 1000 Feet From School

The Dispensary will always be located at least 1000 feet from a private school or a public school that existed before the date the Dispensary submitted its initial dispensary registration certificate application.

##### 2. Parking

The Dispensary has onsite parking and parking adjacent to the Dispensary building.

##### 3. Facility Amenities

The Dispensary site will have: At least two toilet rooms;

Each toilet room shall contain:

Exhibit 16 - Policies and Procedures Manual



- a. A flushable toilet;
- b. Mounted toilet tissue;
- c. A sink with running water;
- d. Soap contained in a dispenser; and
- e. Disposable, single-use paper towels in a mounted dispenser or a mechanical air hand dryer;
- f. At least one hand washing sink not located in a toilet room;

Designated storage areas for medical marijuana or materials used in direct contact with medical marijuana separate from storage areas for toxic or flammable materials; and  
If preparation or packaging of medical marijuana is done in the building, a designated area for the preparation or packaging that:

- a. Includes work space that can be sanitized, and
- b. Is only used for the preparation or packaging of medical marijuana.

#### Commercial Weighing Devices

For each commercial device used at the Dispensary, the Dispensary will:

- Ensure that the commercial device is licensed or certified.
- Maintain documentation of the commercial device's license or certification, and
- Provide a copy of the commercial device's license or certification to the AMCC for review upon request.

#### Maintenance of a Single, Secure Entrance

The Dispensary will have a single secure entrance. Through the use of a single, secure entrance into the Dispensary building, the Dispensary will implement appropriate security measures to deter and prevent the theft of marijuana and unauthorized entrance into areas containing marijuana.

#### No Compensation to Patients and Caregivers

The Dispensary will provide no compensation to qualifying patients or designated caregivers for medical marijuana acquired by the Dispensary from them.

### Prohibition Against On-Site Consumption

The Dispensary will not permit any person to consume marijuana on the property of the Dispensary. The Dispensary will require that all patients sign a form stating that they understand the relevant policies and procedures and agree to abide by them, including the prohibition of consuming marijuana on the property of the Dispensary. The Dispensary will post signs inside the building and enforce the policy.

### Security

#### Authorized Access

The Dispensary will restrict access to the areas of the Dispensary that contain marijuana and if applicable, the Dispensary's cultivation site, to authorized individuals only. No persons under the age of 21 are allowed into the body of the Dispensary, not including the waiting room.

Procedure: Before dispensing medical marijuana to a qualifying patient or designated caregiver, the dispensary agent will enter the qualifying patient's or designated caregiver's registry identification number on the qualifying patient's or designated caregiver's registry identification card into the Department's medical marijuana Electronic Verification System and verify the validity of the qualifying patient's or designated caregiver's registry identification card and age. Access to the Dispensary building and cultivation site will be denied to any individual not providing the credentials listed above and satisfactorily proving eligibility and authorization to enter.

#### Unauthorized Access

To prevent unauthorized access to medical marijuana at the Dispensary, the Dispensary has security equipment to deter and prevent unauthorized entrance into limited access areas that includes devices or a series of devices to detect unauthorized intrusion, which may include a signal system interconnected with a radio frequency method, such as cellular, private radio signals, or other mechanical or electronic device. In addition, a burglar alarm shall be installed that will activate upon motion via entrance through the doors, glass,

rooftop access and cover any shared wall. The alarm shall be monitored by an alarm company.

#### Identification

The Dispensary will provide for the accurate and continuous identification of individuals authorized to enter the Dispensary.

Procedure: Before dispensing medical marijuana to a qualifying patient or designated caregiver, the dispensary agent will verify through photo identification that an individual presenting a medical marijuana identification card is the same as the individual depicted on the identification card, enter the qualifying patient's or designated caregiver's registry identification number on the qualifying patient's or designated caregiver's registry identification card into the Department's medical marijuana electronic verification system and verify the validity of the qualifying patient's or designated caregiver's registry identification card and age. Access to the Dispensary building will be denied to any individual not providing the credentials listed above and satisfactorily proving eligibility and authorization to enter.

#### Security Equipment

The Dispensary has security equipment to deter and prevent unauthorized entrance into limited access areas that includes devices or a series of devices to detect unauthorized intrusion, which may include a signal system interconnected with a radio frequency method, such as cellular, private radio signals, or other mechanical or electronic devices. In addition, a burglar alarm shall be installed that will activate upon motion via entrance through the doors, glass, rooftop access and cover any shared wall. The alarm shall be monitored by an alarm company.

#### Intrusion Detection

The Dispensary will comply with all AMCC and City rules and regulations with regard to mandatory security and monitoring devices to prevent and detect unauthorized intrusion

into the Dispensary building. The Dispensary will contract with a security and alarm monitoring company to conduct in-person and remote surveillance of the Dispensary building and cultivation site on a 24/7 basis. In addition, during business hours, the General Manager and Security personnel will ensure that all electronically restricted access controlled doors are properly secured and set to alarm as a result of any unauthorized intrusion. During non-business hours, the General Manager will ensure that the security system is armed and operational by securing all interior doors, electronically restricted access doors, and the exterior door and setting the security system by way of a confidential access code.

#### Exterior Lighting

To prevent unauthorized access to medical marijuana at the Dispensary and, if applicable, the Dispensary's cultivation site, the Dispensary has security equipment to deter and prevent unauthorized entrance into limited access areas that includes exterior lighting to facilitate surveillance.

Procedure: At a minimum, the Dispensary shall maintain lighting to provide a minimum of 2-foot candles of light throughout all parking lots and the exterior entrance of the Dispensary building. The General Manager will ensure that all such lights are properly working at all times.

#### Electronic Monitoring

The Dispensary will conduct electronic monitoring both in and around its Dispensary building. The Dispensary will conduct electronic video monitoring of all visitors in the parking lot and in the entry area of the Dispensary building.

Procedure: All patients entering the dispensary shall remove their hats, sunglasses, and other similar objects, which obstruct physical identification. This shall not apply to clothing worn over the face for established religious reasons. At all times during business hours, at least one dispensary agent within the Dispensary building will be tasked with monitoring the electronic video monitoring systems and responding to any issues of security or safety that may arise. To prevent unauthorized access to medical marijuana at the Dispensary, the Dispensary has security equipment to deter and prevent unauthorized entrance into

limited access areas that includes electronic video and visual monitoring, including but not limited to:

- At least one 19 inch or greater call-up monitor;
- A video printer capable of immediately producing a clear still photo from any video camera image;
- Video cameras that: (1) Provide coverage of all entrances to and exits from limited access areas and all entrances to and exits from the building, capable of identifying any activity occurring in or adjacent to the building; and (2) Have a recording resolution of least at 704 x 480 or the equivalent;
- A video camera at each point of sale location allowing for the identification of any qualifying patient or designated caregiver purchasing medical marijuana;
- Storage of video recordings from the video cameras for at least 30 calendar days;
- A failure notification system that provides an audible and visual notification of any failure in the electronic monitoring system; and
- Sufficient battery backup for video cameras and recording equipment to support at least five minutes of recording in the event of a power outage.

The General Manager will be responsible for ensuring that all electronic video and visual monitoring security equipment is properly functioning at all times.

### Panic Buttons

The Dispensary will install and maintain working panic buttons in the interior of the Dispensary. All dispensary agents at the Dispensary building will have access to and be made aware of the location of multiple panic buttons throughout the sites. Panic buttons are located within the Dispensary at the receptionist desk, all teller stations, within the vault and in the common area of the Dispensary.

Procedure: Dispensary agents will be trained on the specific location of panic buttons and the specific circumstances under which panic buttons should be used, including disorderly conduct, criminal invasion, and other security emergencies. The General Manager will ensure that all interior panic buttons are properly functioning at all times.

### Loitering

The Dispensary will provide for the accurate and continuous identification of individuals authorized to enter the Dispensary or its cultivation site.

Procedure: The Dispensary will post signs stating “no loitering” throughout the parking area utilized by patrons. Signs shall be placed in locations visible to all patrons. The Dispensary will periodically monitor the public areas around the Dispensary building to ensure no loitering is taking place and escort individuals away from the public areas around the Dispensary in the event that any loitering occurs.

### Transportation

The Dispensary eventually plans to transport marijuana and marijuana infused products between the Dispensary and the Dispensary’s cultivation vendors, as well as to deliver marijuana and marijuana infused products to a qualifying patient, designated caregiver.

#### a. Trip Plans (if applicable)

The Dispensary will ensure that at least two dispensary agents will be the only individuals permitted to transport marijuana, marijuana plants, and marijuana paraphernalia between the Dispensary and; a qualifying patient or a qualifying patient's designated caregiver. In all such instances, the Dispensary will complete a trip plan, compliant with the requirements below.

#### b. Contents

If the Dispensary transports marijuana, marijuana plants, and marijuana paraphernalia as shown above, before transportation, the responsible dispensary agent will complete a trip plan that includes:

- The name of the dispensary agent(s) in charge of transporting the marijuana;
- The date and start time of the trip;
- A description of the marijuana, marijuana plants, or marijuana paraphernalia being transported; and
- The anticipated route of transportation

Procedure: The Dispensary will utilize a Trip Plan Form that requests and requires entry of the data listed above. The cultivation site General Manager or designated dispensary agent will prepare a Trip Plan Form in duplicate, including each of the data items listed above. The General Manager or designated dispensary agent will retain one copy for filing with the Dispensary and provide the second copy to the dispensary agent transporting any products.

#### Agent responsibilities

In addition to the responsibilities of a dispensary agent regarding the completion of the Trip Plan Form, if the Dispensary transports marijuana, marijuana plants, and marijuana paraphernalia, before transportation, the responsible dispensary agent will file a copy of the trip plan with the Dispensary. The responsible dispensary agent will also enter the end time of the trip and any changes to the trip plan and provide a final copy of the trip plan to the Dispensary. The Dispensary will retain the final copy of the trip plan in electronic form at the Dispensary building. Any dispensary agent transporting medical marijuana will follow the procedures set forth below.

Procedure: The General Manager or designated dispensary agent will send an electronic copy of the trip plan to the Dispensary before transportation begins. The General Manager will confirm receipt of the trip plan by the dispensary agent prior to transportation begins. The Dispensary will retain the electronic copy of the trip plan filed prior to transportation at the Dispensary building. During transportation, the dispensary agent will:

- Carry a copy of the trip plan on the dispensary agent's person for the duration of the trip;
- Use a vehicle without any medical marijuana identification;
- Ensure that the dispensary agent has a means of communication with the Dispensary; and
- Ensure that the marijuana, marijuana plants, or marijuana paraphernalia are not visible.
- Ensure that all traffic laws are followed.
- Ensure compliance with all other items on the Dispensaries internal transport checklist.

#### Record/ Retention

The Dispensary will maintain all trip plans described above at the Dispensary in compliance with the Dispensary's Document Retention Policy for at least five years from the date of the filing of the trip plan and, upon request, provide a copy of any trip plans to the AMCC for review. The Dispensary will maintain all trip plans in electronic form at the Dispensary building. The General Manager will be responsible for ensuring that trip plans are accounted for and accurate. The Dispensary's trip plans will be stored within the Dispensary's electronic servers.



## 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.

Rory Murphy  
Printed Name of Verifying Individual

  
Signature of Verifying Individual

OWNER  
Title of Verifying Individual

02-27-2023  
Verification Date

Applicant will ensure all Agents are properly trained to understand the importance of maintaining safety and compliance in the workplace while paying strict attention to the movement of inventory inside and outside of the building.

**17.1 - Individual batches of medical cannabis being received for storage and/or dispensing were appropriately prepared, packaged, and labeled at the time of receipt.**

The chain of custody of medical cannabis products is extremely important in terms of compliance and security. Applicant will provide a clear chain of custody for inventory at all times from the time incoming inventory reaches the receiving area rear door to when it leaves through the front door with a customer's purchase. The Inventory Manager is responsible for enforcing policy and procedure when Applicant acquires cannabis infused products from a licensed medical use cultivation center, infuser, or transporter. When receiving inventory, the Inventory Agent in charge checks and records the date, time, vendor name and address, photo of valid government ID and Agent badge, proof of valid current licensing, purchase order number, quantity ordered, quantity received, and condition of product received including any damage, proper labeling, original packaging. All individual packages, batches of medical cannabis being received for storage and or for dispensing will be inspected to ensure all products were appropriately prepared, packaged and labeled at the time of receipt. Every product transport form will include the phone number for the Alabama Poison Control Center – (800) 222-1222.

Upon intake, the Inventory Agent in Charge will inspect and count each individual package and product for the METRC manifest. Agent will ensure the RFID (QR code) matches the product(s) description, including weight(s) and testing results, ensuring the testing results came from a State approved testing lab. Upon cannabis delivery, the Applicant will confirm: The product's name, strain name, weight, name of processor or integrated facility, the facility of origin, date of processing, date of packaging, the name of the testing lab and the date that testing was approved.

**17.2 - Incoming medical cannabis is accompanied by the Secure Transporter's**

**manifest and other appropriate documentation; the information thereon is accurate, and the manifest as been duly executed by all appropriate parties**

An identification number on the manifest should match the information on the cannabis product label and package. The product name listed and the weight listed in the State's verification system shall match the product packaging. Once the shipment is verified, the inventory agent will proceed to accept the shipment into METRC and enter all the information into the POS system - Biotrack.

**17.3 - All information from the QR code relating to the incoming medical cannabis, as well as the date and time of arrival, has been logged into the Statewide-Seed-to-Sale Tracking System**

The BioTrack inventory point-of-sale system functions in real-time, and provides web-based accessibility by the Commission at any time Applicant has the following procedures and protocol for inputting information into BioTrack. All physical inventory must arrive with a generated manifest and RFID tags. The tags must match the package tags listed on the manifest. Inventory must then be manually counted to ensure it matches the manifest. Once the inventory counts have been verified, the agent will be authorized to pay the courier/vendor, and then log into BioTrack. The following is the procedure for receiving inventory:

1. Go to the 'Transfers' tab and select the incoming manifest that corresponds with the manifest.
2. Click on the button marked 'Receive'.
3. A new window should open; enter the received quantities of all the packages.
4. Hit 'Receive Transfer'. Note: Should the actual counts not match the package amount in Dutchie do not accept the package. Contact the Agent in Charge.
5. Once the package(s) have been accepted, go to the 'Inventory' tab in Dutchie, click on

'New Inventory' button.

6. Enter the vendor, product, weight or quantity, and RFID tag. The usable weight for non-weighable products should auto-populate. Click 'Add' then add any other products from the same vendor. Note: If the usable weight or price is different for these products than what is already populated on the screen you will need to change it here. You will need to go to the 'Products' button to update the changes permanently.

7. Once you have entered all the products, hit 'Create'.

8. Count all items that are to be transferred.

9. Go to the 'Inventory' tab, 'Current Inventory' in Dutchie, and select the item(s) that will be transferred to the Retail Sales Agent's inventory. Example, The Retail Sales stations include POS1 to POS 5.

10. Click 'Move Items.' A new window should open, choose 'Bulk Inventory' for the new room, hit 'Move Everything,' hit 'Save and Continue,' then when the dialog box opens up, hit 'Yes.'

Applicant will ensure accountability by recording any access into the network using unique user passwords and by restricting IP addresses and MAC addresses to specific computers. The use of third party email, web, and data servers will be avoided.

**17.4 – Medical cannabis products being received by the Dispensary by means of a Secure Transporter must be appropriately packaged, labeled, and inserted in containers prior to transport.**

Applicant will engage a third party for our transportation and shipment of products when needed. This third-party service is highly qualified in secure transportation, having A 2-3 guard team that will be available on premises during business operating hours when the need to transport movement of cash, goods and/or products. Pickups,

drop offs will be secured by the 2-3 men in separate vehicles to cover entry, route, and exit to and from destinations. To ensure the security of transport agents and of inventory being transported and to comply with Commission regulations, we have adopted the following procedures described in this section:

- Vehicles will not have any medical marijuana identification, and no medicine, plants, or paraphernalia will be visible.
- All shipping of any product from our facility will include the use of trained security or internal personnel in teams of two.
- Transportation drivers will be required to successfully complete our training on how to prevent robberies, protect their lives, and stop cars from hijacking.
- Drivers will have their driving records examined annually to ensure they maintain safe driving habits. They may also undergo quarterly re-training in task specific duties to ensure procedures are followed.
- Prior to transportation of any marijuana edibles, or marijuana-infused products, an agent will verbally confirm the ordered products and verify the identity of the outgoing vendor and all applicable licenses are current and valid. The details of the confirmation obtained must be entered into a log, which will be maintained by the dispensary and made available for inspection by the appropriate law enforcement agency.
- Shipments must be accompanied by a manifest produced by METRC along with all testing results pertaining to the products in the shipment.
- The dispensary driver shall secure a signature from the incoming Agent as well as record the Agents state required badge number when the items are delivered.
- The shipment shall be routed and reported to the AMCC as required and any variation from the submitted transportation slip shall be reported.
- The transportation driver shall have his or her medical marijuana establishment agent card in his or her immediate possession during the transportation and/or delivery.
- All transport vehicles will be equipped with GPS monitoring which will track the route and delivery times as well as other information to increase productivity, encourage safe driving habits, and minimize delivery related expenses.

- Transport agents will be able to engage in two-way communication with the medical marijuana establishment during transport in case of emergency.

**17.5 - Batches and containers being shipped by the Dispensary to or from another licensee's facility**

All incoming medical marijuana products from other medical marijuana establishments will be accepted by the designated agent and placed in a sealed and locked container. Products will remain in the locked transport container during transport. The locked transport container will ensure the sanitary and secure transportation of the products. We will require all transported materials to have a detailed transit slip prepared which will include: the origination of the items, a description of the products being transported, the identifying RFID tag generated by METRC, date product was produced, date of the processors or integrated facilities state laboratory testing approval, designated and actual route of transport, name and registry identification number of the transport agent responsible for the transport, and date and time of departure and arrival.

All transportation documents will be computerized and ready for inspection, with appropriate commercial liability insurance that covers travel. All transport of products will be supported by a detailed transit slip containing: maps and designated routes, date and departure times, the name and identification number of the dispensary agent responsible for the transport, and product descriptions.

A copy of this slip is kept at the facility and a copy is carried by the transport agent during the trip. Prior to departure the transportation information will be reported to the AMCC as required. The transport agent will record the end-time and actual route of the trip on the transit slip. All transport records will be kept and maintained by the facility and provided to the Commission for review upon request. We plan to digitize all transport recordkeeping and integrate delivery and transport data directly into our inventory tracking system. A transport agent must report any vehicle accident that occurs during the transportation to the Dispensary Manager

Exhibit 17 - Receiving and Shipping Plan

within two hours after the accident occurs. Any loss or theft of product that occurs during the transportation must be reported immediately to the Dispensary Manager as soon as the transport agent becomes aware of the loss or theft. Any report of loss or theft received by the dispensary must be immediately reported to the appropriate law enforcement agency and to the AMCC.

**17.6 - Outgoing medical cannabis being sent for testing is accompanied by the Secure Transporter's or State Testing Laboratory's manifest**

All responsible agents will use the following form for transit slip.

This form is to be used when transporting Marijuana between Licensed medical marijuana facilities. Transporting can be done only by medical marijuana establishment agents. The person traveling with this medicine is authorized by the AMCC to deliver medicine to a medical marijuana establishment.

Please contact The Company. (Phone and address)

Date of transport: Originating Facility Name: Originating Facility Reg ID: Originating Facility Address: Delivery Address: Receiving Facility Name: Receiving Facility Reg ID: Receiving Facility Address: Approximate Distance of travel: Weight: Names of the Strain(s) or Product(s) being transported: Description of Strain(s) or Product(s): Details of Product Origin: Expiration Date of Product: Date of Approved Lab Testing: Chemical Contents of the product: Transporting Agent Name: Transporting Agent ID: Transport Vehicle license plate: Departure Time: Travel Route details: Arrival Time: Other details:

The company will provide continual training on user procedures.

Our inventory recordkeeping and software system will be managed by our IT Agent. All data and information will be secured and encrypted and backed up automatically every night, not only to a private server on site, but also to a secure, off-site server location, thus safeguarding our data against disaster. For data backup we will be using a Mac Time-Capsule on site and encrypted FTP for transfer to secure off-site storage Preventative procedures are put in place to further ensure inventory control. Agents involved in handling the inventory, and who have access to a restricted area, will have an

Exhibit 17 - Receiving and Shipping Plan

electronic key card and will be identified by the system with a secure authentication procedure (electronically readable ID). Ingress and egress will be recorded for every room and the inventory is identified by electronic reading of its tracking number – METRC RFID tag. The system automatically aggregates inventory by the types of transitions through which it passes (all sales, all deliveries, etc.) and time of day (e.g., the disposition of any and every product at 3:00pm: being sold, in transit, etc.).

Applicant will maintain records, journals and logs at strategic locations that coincide with the documentation procedures for efficient inventory movement. These written records ensure accountability and are useful tools for double checking the physical and electronic inventory. Applicant will use both written records and electronic records to perform inventory audits. Applicant's inventory will be reconciled in the morning before customers have opened the building and after the last customer leaves that night. Applicant will also complete category specific audits on a daily basis. The Inventory Manager will ensure all inventory categories are audited at least once on a monthly basis. Once each quarter, the entire dispensary inventory will be audited by a blind audit with all Director level and manager level agents involved. This audit will be completed after business hours. Example of Procedure for Counting Inventory SOP: 1. Use the inventory sheet on Google Drive. 2. Go to the 'Inventory' tab in Biotrack, hit the 'Inventory Audit' button. 3. A full audit will populate in the window; you will need to select a category from the drop-down menu to refine your audit. 4. Enter the counted physical inventory into the 'New Weight' section for the corresponding inventory item. Hit 'Save and Continue' between inventory items. Note: Should any of the inventory counts be off, leave the count blank (skip over it) and continue with the rest of the audit. You will need to investigate the discrepancy after the rest of the audit has been completed. 5. Hit 'OK' when the audit is complete.

**17.7 - All information from the QR code relating to the outgoing medical cannabis, as well as the date and time of shipment, has been logged into the Statewide-Seed-to-Sale Tracking System.**

Inventory reconciliation in BioTrack: 1. Once the inventory audit has been completed in BioTrack, you will need to audit the packages. 2. Log into BioTrack, go to the 'Packages' tab, Exhibit 17 - Receiving and Shipping Plan



## License Type: Dispensary

filter the packages by 'Category'. 3. Do a side-by-side comparison of your BioTrack packages and your manifest. 4. Any discrepancies will need to be investigated immediately. Note: Should the actual counts not match, contact the Agent in Charge. 5. Sign the sheet, have the Agent in charge sign off the sheet. Applicant will establish an account with the State's verification system, METRC that documents: 1. Each sales transaction at the time of sale and each day's beginning inventory, acquisitions, sales, disposal, and ending inventory 2. Acquisition of cannabis and cannabis-infused products from a licensed adult use cultivation center, craft grower, infuser, or transporter, including: (i) a description of the products, including the quantity, strain, variety, and batch number of each product received (ii) the name and registry identification number of the licensed medical use cultivation center, or infuser providing cannabis and cannabis-infused products (iii) The name and registry identification number of the licensed medical use cultivation center, craft grower, infuser, or transportation agent delivering the cannabis iv) the name and registry identification number of the dispensing organization agent receiving the cannabis; and (v) the date of acquisition

Applicant will conduct **daily** inventory reconciliation, documenting and balancing cannabis inventory by confirming the State's verification system matches the dispensing organization's point-of-sale system and the amount of physical product at the dispensary.

Applicant understands that it must receive AMCC approval before completing an inventory adjustment. To this end, Applicant will provide a detailed reason for the adjustment.

Inventory adjustment documentation shall be kept at the dispensary for 2 years from the date performed. If an imbalance is discovered, due to a mistake, in the amount of cannabis after the daily inventory reconciliation, Agent in charge will determine how the imbalance occurred and immediately upon discovery take and document corrective action. If the Agent cannot identify the reason for the mistake, within two (2) days, 48 hours of first discovering, Applicant shall immediately inform the AMCC in writing of the imbalance and the corrective action taken to date. Details of adjustments will be provided to AMCC. Upon approval, adjustments will be documented and kept on record for a period of two (2) years from the date adjustment was performed. Applicant will work diligently to determine the

reason for the mistake.

The Compliance Agent in Charge will verify at the end of each business day that all product that has been received is recorded in both the State reporting system - METRC, and BioTrack POS systems. Should any product not be entered into the system by the end of the day, it will be placed in a restricted access area with all accompanying documentation, including information and that the product is not ready for resale. Product will be entered into the system the following business day.

No product will ever be offered for sale until all documentation is verified and all the product is properly entered into the POS system.

BioTrack will be used to maintain records of every product in our dispensary and to generate labels and barcodes during sales transactions.

Every product at our dispensary will be tagged with a unique (sequential) identification number. This number is visibly displayed and encoded in an electronically readable format (a bar code).

The inventory control tags will be created using thermal barcode printing technology. BioTrack provides tracking and tracing through the use of RFID for real time Commission reporting capability.

Embedded standards for maintaining the confidentiality of information related to cannabis. Internally linked procedures for verifying the identity of product upon intake, delivery and purchases. The software was built by regulators specifically for oversight and gives visibility that allows companies to follow strict rules, regulations, and statutes in the cannabis and cannabis industry.

## 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.

*Aretha Dix*

Printed Name of Verifying Individual

*Owner*

Title of Verifying Individual

*Aretha Q. Brown, DNP*

Signature of Verifying Individual

*18 Dec 2022*

Verification Date

**18.1 Facility Name and Type**

Facility Name [REDACTED]

Facility Type: Dispensary

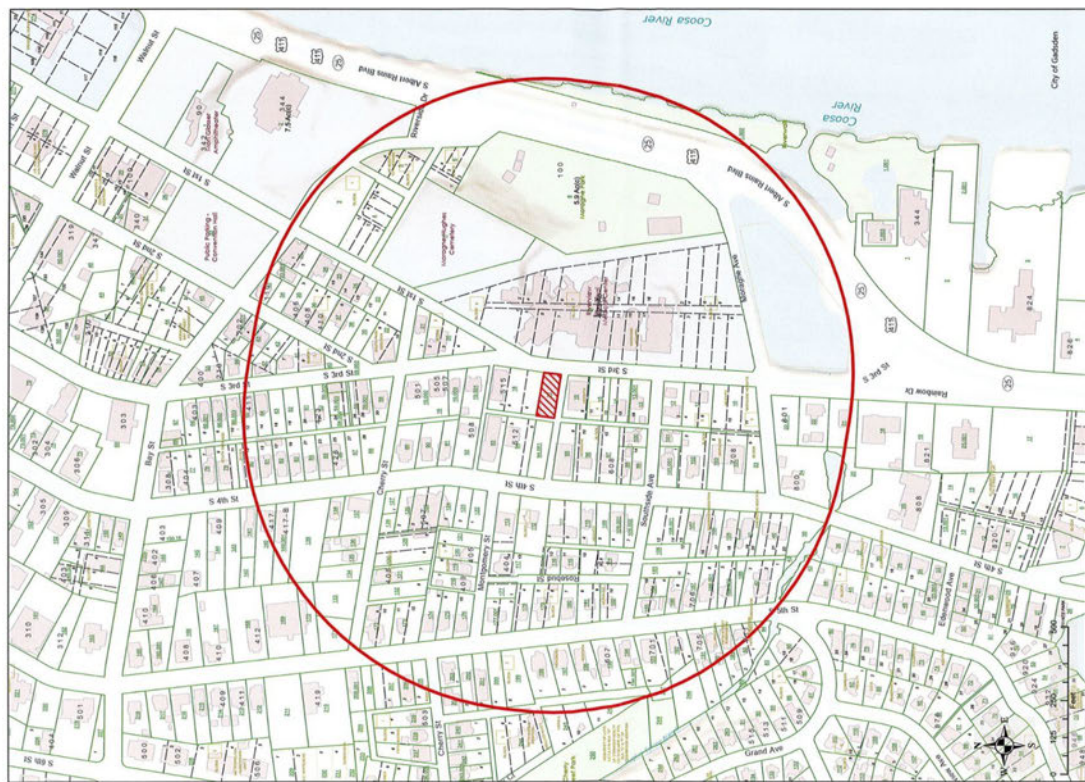
**18.2 Physical Address & GPS Coordinates of Facility**

525 South 3rd Street Building C/D

Gadsden, AL 35901

GPS Coordinates: 34° 00' 47.7" N 86° 00' 41.1" E

**18.3 Aerial Photograph of Facility**



**18.4 Proof of Authorization to Occupy Property**

Exhibit 18 - Facilities

The Applicant leases the property identified in 18.2 above. See attached lease agreement (identified as “Lease Agreement – Attachment to Exhibit 18, Section 18.4”)

**18.5 – Local Jurisdiction Approvals**

The City Council of Gadsen, Alabama adopted an ordinance approving the operation of cannabis dispensary operations in said municipality. See attached copy of ordinance (identified as “City Ordinance Approving Cannabis Dispensary Operations – Attachment to Exhibit 18, Section 18.5”). The applicant has included a certified copy of the zoning ordinance to demonstrate that the applicant is permitted to operate the proposed facility at the proposed location (identified as “Zoning Ordinance – Attachment to Exhibit 18, Section 18.5”).

**18.6 – Blueprint of Facility**

The blueprint for the facility identified in 18.1 above is attached hereto and identified as “Blueprint – LeBleu Fields Cannabis Dispensary Facility – Attachment to Exhibit 18, Section 18.6”).

**18.7 – Facility Timetable**

The applicant expects that construction of the LeBleu Fields Cannabis Dispensary Facility, including compliance with all facility requirements under the Act and the AMCC Rules, will be complete on or before June 10, 2023.

The applicant expects that it will be able to commence operations at the LeBleu Fields Cannabis Dispensary Facility immediately upon licensure by the Commission.

**18.8 – Public Access to Facility**

The LeBleu Fields Cannabis Dispensary Facility will be open to the public.

The applicant anticipates the hours of operation for the facility to be as follows:

Monday – Friday 10:00 a.m. – 7:00 p.m. CT

Saturday 10:00 a.m. – 10:00 p.m. CT

Sunday 1:00 p.m. – 7:00 p.m. CT

**18.9 – Facility Hours of Operation / After Hours Contact**

The applicant anticipates that the [REDACTED] Cannabis Dispensary Facility will be occupied by the applicant’s employees during all public access hours (see 18.8 above) and approximately one (1) hour before and after the public access hours.

After Hours Management Contact

Aretha Dix, General Manager  
525 South 3rd Street Bldg. C/D  
Gadsen, AL 35901  
Cell phone: [REDACTED]

Additional Notes on Exhibit 18:

# CITY OF GADSDEN

December 13, 2022

Alabama Medical Cannabis Commission  
P.O. Box 309585  
Montgomery, Alabama 36130

To Whom It May Concern,

I am writing to express support for this applicant to open and operate a medical cannabis facility in Gadsden. The City of Gadsden has established a task force of administrative leaders to facilitate inquiries and assist with the application process, and this company has been in contact with our administration throughout their application development process.

I feel their business will be beneficial to Gadsden residents and the goals of the state.

I appreciate you taking the time to review my thoughts on their application. If you need any additional information from me, please contact me.

Sincerely,



Craig Ford, Mayor

The information contained in this exhibit is based on the best available knowledge to the applicant at the time of submission. The applicant will update or amend any information in this exhibit that may change. The applicant does not propose any additional facilities



STATE OF ALABAMA

ETOWAH COUNTY

LEASE AGREEMENT

THIS LEASE AGREEMENT made and entered into this 27<sup>th</sup> day of December, 2022,

by and between [REDACTED] hereinafter referred to as "Landlord", and **Le Bleu Fields Business Solutions, LLC**, a limited liability company, hereinafter referred to as "Tenant",

WITNESSETH:

THAT IN CONSIDERATION of the payment of rents and other charges provided for herein and the covenants and conditions hereinafter set forth, Landlord and Tenant hereby covenant and agree as follows:

ARTICLE ONE: PREMISES

Section 1.1 Premises. Landlord hereby leases to Tenant and Tenant hereby rents from Landlord the land and portion of the building thereon located at 525 South 3rd Street, Unit C/D; Gadsden, Alabama 35901, together with the permanent improvements located therein, and the parking lot which serves the Premises, all of which is hereinafter referred to as the "Premises." The Premises are leased subject to all zoning regulations, restrictions, rules and ordinances, building or use restrictions and other laws and regulations now in effect or hereafter adopted by any governmental authority having jurisdiction thereof. The parking lot serves both the Premises and other adjacent property of Landlord. No parking spaces are reserved for a particular person or tenant, and Landlord makes not promise or guarantee that the parking lot is sufficient for Tenant's business purposes. Landlord reserves the right to allocate spaces in the parking lot for specific tenants.

Section 1.2 Delivery of Premises. Landlord shall deliver possession of the Premises on the first day of January, 2023 (the "Commencement Date"). The taking of possession of the Premises by Tenant shall be conclusive evidence that said Premises were in good and satisfactory condition, acceptable to Tenant as of the Commencement Date.

ARTICLE TWO: TERM

Section 2.1 Term. The Term of this Lease (the "Term") shall commence upon the Commencement Date and run for a term of three [REDACTED]



remedy or right set forth herein that Tenant shall not be in default hereunder and that no condition exist which with the passage of time or giving of notice would constitute a default hereunder.

Section 20.6 Construction. The parties have participated jointly in the negotiation of and creation of this Lease. In the event that an ambiguity or question of intent or interpretation arises, this Lease shall be construed as if drafted jointly by the parties and no presumption or burden of proof shall arise favoring or disfavoring either party by virtue of the authorship of any of the provisions of this Lease.

IN WITNESS WHEREOF, the parties have executed this Lease on the date first mentioned above to be effective as of the Commencement Date.

LANDLORD:

Elizabeth Seales  
Witness



TENANT:

Le Bleu Fields Business Solutions, LLC, a  
limited liability company

W. H. Hark  
Witness



### GUARANTY OF PERFORMANCE

The undersigned do hereby personally guarantee the performance of Tenant under the above stated Lease terms, both as to the payment of all sums due thereunder to Landlord and the performance of any and all other acts required thereunder of the Tenant. It is understood and agreed that in the event of any default by Tenant, Landlord shall be entitled, at his option, to immediately demand performance of the Lease term or terms from the undersigned Guarantor, and that a default by Guarantor shall entitle Landlord to pursue its remedies against Guarantor as if Guarantor was a party to the Lease Agreement.

Landlord may, in its discretion, at any time, renew this Lease or extend the time of payment of rental or any sums owing by Tenant at any time without notice to or consent of the undersigned without in any way impairing or affecting the obligations of the undersigned on this



guaranty and underlying Lease. This is a continuing guaranty.

In the event that Tenant should at any time be in default of the Lease, the undersigned agrees to pay such debt at once, and upon failure of the undersigned to do so Landlord may, in its discretion, enforce the collection of such debt out of the undersigned by suit in court, or in any other manner provided by law, the same as if such debt were the primary and individual debt of the undersigned, and without first seeking to enforce the said debt by suit or otherwise out of Tenant; or Landlord may, in its discretion, proceed in any manner provided by law for collection of debts against either or both the undersigned and Tenant the same as if such debt were primarily and individually the debt of both the undersigned and Tenant. The undersigned agrees to pay all costs, including reasonable attorneys' fees and legal expenses, incurred by Landlord in collecting or attempting to collect on this guaranty. This guaranty shall be binding upon the undersigned and the heirs, personal representatives, and assigns of the undersigned, and shall inure to the benefit of Landlord, its heirs, successors and assigns.

Dated this the 28 day of December, 2022.


  
\_\_\_\_\_  
Aretha Dix

STATE OF ALABAMA

COUNTY OF ~~ETOWAH~~  
Montgomery

I, the undersigned, a Notary Public in and for said County and State, hereby certify that Aretha Dix, whose name is signed to the foregoing personal guaranty instrument, and who is known to me, acknowledged before me on this day that, being informed of the contents of said instrument, he executed the same voluntarily, on the day the same bears date.

Given under my hand and seal this the 28 day of December, 2022.

  
\_\_\_\_\_  
NOTARY PUBLIC







# City of GADSDEN

P. O. Box 267  
Gadsden, Alabama 35902  
Phone: (256) 549-4520  
FAX: (256) 549-4851

Heath Williamson  
*Director of Engineering*

Nick Hall  
*Director of Planning*

December 27, 2022

LeBleu Fields Business Solutions, LLC  
d/b/a LeBleu Fields

Re: Zoning Verification Letter  
525 South 3<sup>rd</sup> Street  
Building C & D  
Gadsden, AL 35901  
Medical Cannabis Dispensary

To Whom it May Concern:

The subject property located at 525 South 3<sup>rd</sup> Street, Building C & D, Gadsden, AL, 35901, is located within the corporate limits of the City of Gadsden and has a zoning designation of O-1, Office District. The City of Gadsden Chart of Permitted Uses, Chapter 130, Section 312(f) allows for a Medical Cannabis Dispensary as a "use by right" in an O-1, Office District. This letter does not exempt this use or property from any other requirements for permitting or licensing.

A Medical Cannabis Dispensary, as proposed to be located at 525 South 3<sup>rd</sup> Street, Building C & D, Gadsden, AL, 35901, being a "use by right" in an O-1, Office District, is eligible to apply for a City of Gadsden business license only after the applicant has received a provisional Integrated Facility license or a provisional Medical Cannabis Dispensary license, as may be applicable, from the Alabama Medical Cannabis Commission.

The subject property is in compliance with the Alabama Medical Cannabis Commission Rules and Regulations, Chapter 8, Regulation of Dispensaries, Section 538-x-8-.04. Requirements and Limitations as to Dispensing Sites.

This information was researched on December 27, 2022, by the undersigned, per request and as a public service. The undersigned certifies that the above information contained herein is believed to be accurate and is based upon, or relates to the information provided by the requestor. The Authority assumes no liability for errors or omissions. All information was obtained from public records, which may be inspected during regular business hours. Should you have further questions, please contact me at 256-549-4525.

Sincerely,

Tina P. Cody  
Zoning Administrator  
City of Gadsden Planning Department

**City of Champions**

## 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.

*Aretha Dix*

Printed Name of Verifying Individual

*owner*

Title of Verifying Individual

*Aretha Q. Blanton-Dix*  
Signature of Verifying Individual

*28 Dec 2022*  
Verification Date

Applicant's security policies and procedures have been carefully developed to ensure the highest standard of safety and compliance with the AMCC rules and regulations. The following security protocols, best practices, training requirements, and processes are part of a multi-faceted plan to integrate safety and compliance with a positive, educational, and enriching purchasing experience for our Patients. These procedures also support product integrity for all products kept on the premises; will prevent internal product diversion and external threats and comply with all Commission regulations, requirements, and rules and all applicable laws. This Security Plan is a living document that will be reviewed on a constant basis and considered with input received from local law enforcement, the AMCC, regulation changes, and input from staff.

**19.1 – Twenty-four-hour alarm systems must be installed in all facilities where cannabis or medical cannabis products are present.**

Twenty-four-hour alarm systems will be installed at our dispensary. Such alarms shall be provided and installed by experts (FCBG Security ) in industry-standard commercial-grade alarm systems. FCBG will ensure all Alarm systems will be fully operational, securing all entry points and perimeter windows, be equipped with motion detectors and pressure switches, and must cover all areas where cannabis or medical cannabis products are delivered, received, handled, stored, prepared, dispensed or sold. See floor plan below.

- Alarm System: The Dispensary will have a perimeter alarm on all entry points and glass break protection on perimeter windows. Windows will have security shatter proof tinted film on exterior windows.
- A failure notification system will be implemented that provides an audible text, or visual notification of any failure in the surveillance system, including but not limited to, panic buttons, alarms, and video monitoring system. The failure notification system shall provide an alert to designated company agents within 5 minutes after the failure, either by telephone or text message.
- Additionally, all POS systems will have a panic button within reach to allow agents to immediately signal danger.

- There will also be a panic button in the vault area and the front desk/reception area where initial ID procedures take place.
- All alarm systems will be monitored by a local alarm company. Monthly maintenance checks performed and validated by the security agent. in accordance with all AMCC rules and regulations.

All interior cameras cover each point-of-sale location, the vaults and safes, and cannabis products from at least two angles in storage and the product waste disposal area. The twenty-four-hour (24) video surveillance capability is integral to security, compliance, and inventory control. If the video system is rendered inoperable for whatever reason, the security agent will begin closing procedures after 15 minutes and all other staff will vacate the building until business can safely and legally resume. Both interior and exterior Security Agents will be in constant communication via mobile devices to ensure immediate and effective response time. Security agents will also be accessible and able to communicate with all Agents on duty simultaneously via mobile devices. Motorola XPR 3300e commercial grade two way radios.

The Security alarm hold up system will consist of the following:

DMP XR150 Control Panel (1), DMP 7872 Touch screen keypad (2), Wireless Door Contract (3), Wireless Motion Detector (5), Wireless Glass Break (3), Wireless Panic Button (8), Wireless Receiver (1), Wireless Repeater (1), Wired Roof Beams (4) Wired Siren (1)

Upon request, we shall make available to the Commission or its inspectors all information relating to security alarm systems, monitoring, alarm activity, maps of camera locations and camera coverage, audio/video footage, surveillance equipment maintenance logs, authorized use lists, operation instructions, and any other security related information deemed relevant by the Commission or its inspectors. However, we have internal protocols to monitor all security equipment to ensure it is operable and in compliance.

Upon request, our Company shall make available to the Commission or its inspectors all information relating to the Dispensary's security plan.

Security Floor Plan Example:

Exhibit 19 - Security Plan

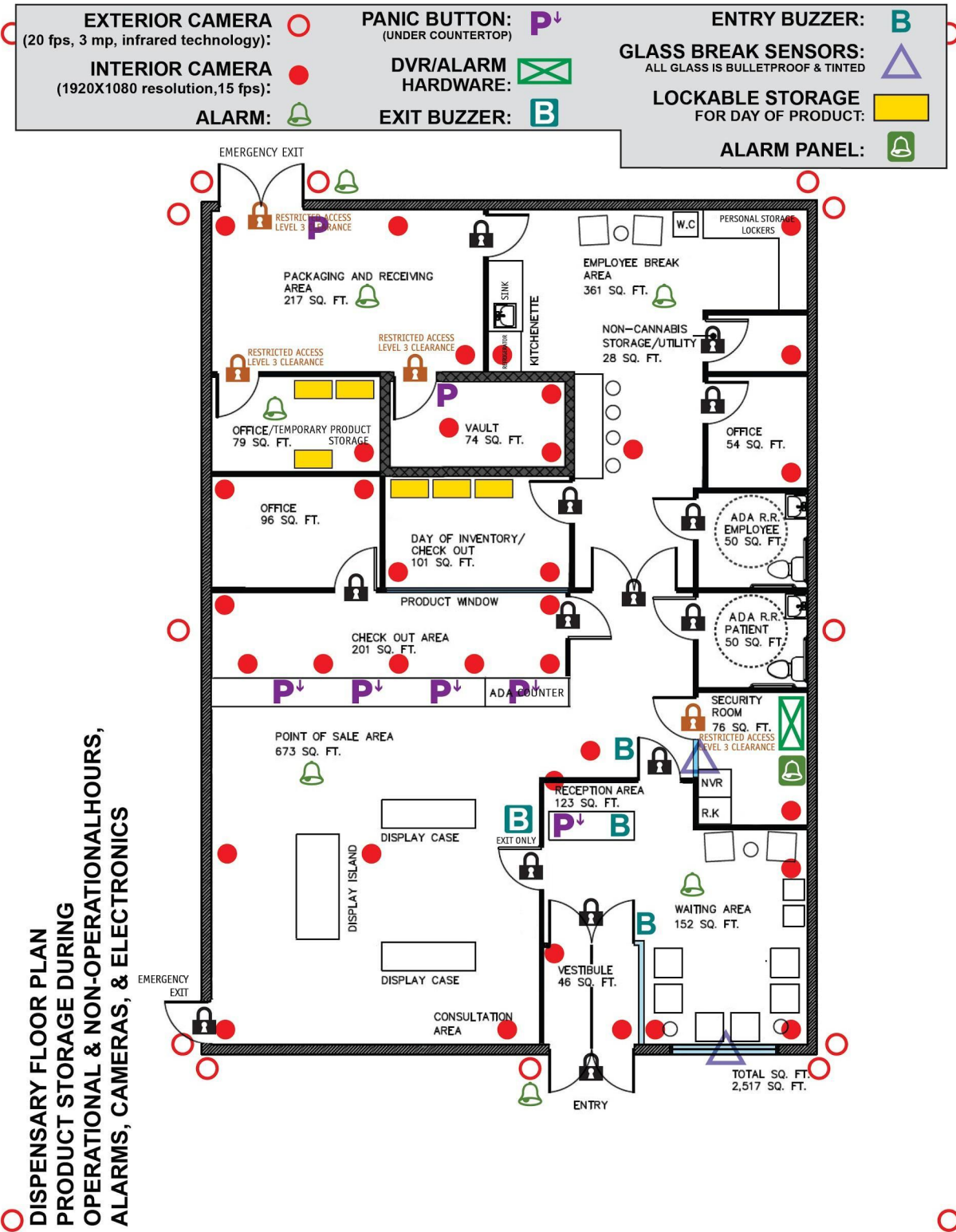


Exhibit 19 - Security Plan



**19.2 – Reception areas and personnel adjacent to ingress and egress points shall have ready access to duress panic and hold-up alarms that may be activated in the event of access by unauthorized personnel or intruders.**

Panic buttons will be located adjacent to ingress and egress points for easy access by the staff. Panic buttons are located throughout the facility. Staff will be aware of where these panic buttons are located in the event of an emergency requiring police contact. A duress alarm will be used if any alarm buzzer is triggered including panic buttons, perimeter alarm, after hours alarm, or any other detection measure used for more than ninety seconds (90), all systems will be programmed to directly contact 9-1-1 and request assistance.

**19.3 – Broadcast communication devices (cell phones, intercom equipment or the like)**

Broadcast communication devices will be carried by all staff as well as personal cell phones to ensure communication and information is readily and easily transmitted throughout the dispensary and between staff members. Carried by each employee or installed in all areas of each Dispensary's facility designed for regular access by humans.

Our company will be providing Motorola digital two-way radios to staff members. The model we chose will ensure sufficient clarity of information to be heard and understood by all personnel and visitors within earshot of the employee receiving the communication. With this dynamic evolution of MOTOTRBO™ digital two-way radios, the company will be better connected, safer and more efficient. The XPR™ 3300e is specifically designed for the everyday worker who needs effective communications. Housed in a compact and durable design, the XPR3300e radio looks like no frills from the outside, with big capabilities on the inside. With systems support and loud, clear audio, these next-generation radios deliver cost-effective connectivity to your organization. Some of the specifications included with these next-generation radios: Integrated Wi-Fi, Over-the-air software updates, Bluetooth® audio, Enhanced audio quality, Improved expandability, Long battery life (up to 28 hours), Expansive range, Waterproof. The XPR 3300e radio is designed to enhance safety, with the

rapid response capability of instant push-to-talk communications. Workers who are unresponsive, can be remotely called via the radio to check status, ensuring your worker is safe. Privacy options are available to protect your communications, and radios can be remotely disabled if they are misplaced. With new noise cancellation technology and improved clarity, the XPR 3300e radio delivers excellent audio quality to make your workplace communications clearly intelligible.

All Managers and security will carry the radio's while on duty. Additional radios will be available for staff in the reception, retail and point of sale positions. For additional safety, staff will be permitted to carry their cell phones while on duty.

**19.4 - The Applicant, at each of its facilities, shall maintain an audio/video surveillance system that shall be in continuous operation 24 hours per day.**

Cameras shall be fixed in place covering both the interior and exterior of the Dispensary's facility, in such quantity, with such lighting, and at such resolution to allow for the clear identification of individuals and activities in all reasonably accessible areas of the premises, including but not limited to all entrances, exits, parking lots, and any area where cannabis or medical cannabis is delivered, received, handled, stored, prepared, dispensed, or sold. Audio/Video surveillance recordings must clearly and accurately display the time and date. Audio recordings shall clearly and accurately capture sound within camera range at a level of 20 decibels or greater. Applicant will implement the use of industry-specific security equipment, in compliance with the AMCC, to ensure the security of our staff and patrons. Such equipment includes secure safes in the vault area, sensitive cameras, adequate lighting, recording equipment, alarm systems, and access controls.

Cameras are equipped with Infrared technology for low light as a backup and software capable of printing and exporting documents for law enforcement review. Cameras will be placed at least 10 ft high, angled down at 45 degrees to allow facial recognition and clear certain identification, reading of license plates, and anything else that could potentially be useful in the instance of diversion. Interior cameras will be installed using fisheye cameras for 360 degree views with cameras in opposite corners for additional coverage from multiple angles. This will allow for two vantage points at every point of sale. Cameras will

be two megapixels and greater, capable of capturing 20 frames per second. All areas, restricted or unrestricted, are monitored. Cameras will record 24 hours a day. Recordings will be available for immediate viewing when necessarily by the Commission or other enforcement agencies. All records will be kept at least 90 days or longer if used as part of an investigation. All recordings will be time and date stamped and will be able to be exported into .jpg .bmp or gif formats. The DVR system will archive records with ability for no alternation and ensure authentication of all recordings. The video surveillance system shall be operational during a power outage with a 4- hour minimum battery backup.

Cameras will provide coverage of: All entrances and exits of the facility, including windows, and all entrances and exits from Limited Access areas, The perimeter and exterior areas of the premise, each point-of-sale location, all vaults' areas and safes, all cannabis product, accessories, and currency storage areas will be captured from at least two (2) angles; this will also be the case in storage and product waste disposal areas; and video will record for a four (4) hour minimum should a power outage occur. The ability to produce a clear, color still photo from all videos at any time requested from the Commission or other law enforcement agencies will be ready and available. All recordings will be time and date stamped. All recording equipment will be serviced every 90 days or sooner if warranted. Audio/Video surveillance recordings will be time stamped clearly and accurately display the date and time. The recordings will clearly and accurately capture sound within camera range at a minimum level of 20 decibels. All recordings will be kept for at least 90 days, or longer upon the request of the AMCC Commission, its inspectors, or any law enforcement personnel. Audio/Video recordings potentially reflecting an incident of actual or attempted diversion will be kept for a longer period of five years, or until resolution of the incident and apprehension and discipline or prosecution of the individuals involved in the actual or attempted diversion. All surveillance recordings are kept in a restricted access room under the highest level of security. Applicant will enter into a contract with a minority vendor for electronic security services who has worked within the Alabama area for 15 years. The installed systems are monitored in our U.L. listed central station for assuring 24-hour police and fire dispatch as well as complete supervision of the system. Fully trained technicians will service our needs around the clock, every day of the year.

**19.5 – As to any facility owned by the Applicant at which medical cannabis is maintained, except a dispensing site, the Applicant must surround the perimeter of such facility with a sufficient fence or barrier to prevent access by unauthorized persons and must have sufficient lighting to allow for the proper functioning of video surveillance equipment at all times.**

Our indoor areas will be sufficiently lit to allow for the identification of individuals and activities. Video cameras with a 19" monitor and a recording resolution of at least 1920 x 1080, or the equivalent, at a rate of at least twenty (20) frames per second, that operate in such a way as to allow identification of people and activities in the monitored space, in all lighting levels, that are capable of being accessed remotely by the AMCC or a law enforcement agency in real time upon request. Cameras and video will operate in such a way as to allow for identification of people and activities in the monitored space, in all lighting levels, that are capable of being accessed remotely by the department or a law enforcement agency in real time upon request. Performance, reliability, and energy efficiency are the key factors in commercial lighting. For our outdoor lighting we chose: Brand: Topaz, Watts: 120W, Lumens: 15,000, Kelvin: 5000K, Voltage: 120-277V, HID Equal: 400W HID, Base: Wall Mount / Junction Box, Beam Angle: 97°. This classic fixture is a great option to uniformly illuminate walkways, loading docks and common areas. All lighting is motion controlled, battery operated and checked regularly (Managers will be required to check lighting equipment at the close of each shift). Any issues with lighting will be addressed to ensure proper function and security. Security will ensure the dispensary interior and exterior premises are sufficiently lit to facilitate surveillance.

The exterior of the building and parking areas will be lit for high visibility, with cameras placed from high vantage points to allow for clear lines of sight with no blind spots. The perimeter of the premises will be patrolled on foot throughout the day by a security officer to perform a check for cleanliness, anything out of the ordinary, damage, etc. Any damage to lighting, structural integrity of the building, or anything that could affect overall security will be immediately reported and any issues addressed. The exterior will be well-lit ensuring there are no dark areas within 20 ft of any exterior wall. Security will ensure that trees, bushes, and other foliage outside of the dispensary premises do not allow for a

person or persons to conceal themselves from sight. Electronic video monitoring will be used, capable of capturing 20 frames per second. Exterior video will be 3 megapixels. Cameras are equipped with Infrared technology for low light as a backup and software capable of printing and exporting native form documents for law enforcement review. Retail and other large-scale facilities throughout the globe use overhead lighting fixtures as an integral part of their everyday activities. While often taken for granted, these lights are critical to ensure efficient, safe and effective business operations. For indoor lighting, we have chosen LED lighting. The advantage of LED ceiling lights is their dramatically improved energy efficiency over traditional lighting technologies, and improved quality of light produced. Specifically high-quality linear LED high bay lights. Features include motion sensor, power select, and color select technology to adjust lighting to the desired brightness and color, creating a secure yet calming atmosphere for our customers. Applicant, in accordance with the AMCC will make sure a sufficient barrier is surrounding the dispensary to prevent trespassers from entering. This along with security walking the perimeter will lower our dispensary and staff risks of intrusion.

**19.6 - Exterior doors of each facility operated by the Applicant must be designed or reinforced to withstand unlawful forcible entry.**

Applicant will ensure all exterior doors always remain locked while allowing egress for all patrons during an emergency. See above floor plan that indicates emergency exit routes and sufficient lighting. All doors will be equipped with a keyless entry system called Watchnet. The company chose this system for its security features as well as the versatility to change the means of ingress and egress on demand. This system can reassign door functions as necessary at 3 levels of security access. Reassignments can be made via a computer or through mobile access ensuring any and all doors can be opened or shut during an emergency. Exterior doors of each facility operated by a Dispensary must be designed or reinforced to withstand unlawful forcible entry. All Exterior doors and frames will be solid steel construction and be able to conform to the following specifications or equivalent: 30 man-minutes against surreptitious entry, 10 man-minutes against forced entry, 20-man hours against lock manipulation, 20-main hours against radiological

techniques. Doors must permit ingress and egress to employees and other appropriate persons by the facility's occupants. In the event of an emergency, security or level 3 staff are able to reassign the magnetic door locks to allow for ingress or egress for all occupants. Doors must permit ingress to employees and other appropriate persons (other than Patients and Caregivers) only by means of a keycard or other similar electronic access devices.

Watchnet – a keyless access control system will be used on all our doors. For security and compliance, doors to the Limited Access Area (retail sales floor) have an electronic locking device that can only be opened via electronic key card access (agents), by the security level assigned to the access card and by remote button control. The Company chose the WAC-HIC-ISO Card Pro system. These cards are low frequency(125K) with increased read performance and this ISO Card is specifically well suited for automated management of systems such as Restricted Access Control. The reception agent will be notified by security when additional customers will be allowed into the retail sales area and how many can enter. Security will make sure the staff are aware and ready for the intake of customers at that particular time. When the customer is ready to enter the dispensing area, the Reception Agent will use an electronic buzzer located under the reception desk to open the Dispensary floor door. A certified dispenser will greet the customer and help them with their product selection. Each staff member has an electronic key card with assigned signature and restricted authorized access in the dispensary. These badges are assigned with the proper level of security allowing for successful completion of role and responsibility but limiting access throughout their workday thus allowing the Dispensary to maintain tight security measures that can be documented electronically on a daily basis. Company Security level explanation. Security Area Level One (1): Level one Agents have the most restricted access. Security level one employees have access to the reception area, retail sales floor, employee lockers and employee break room. Level One agents can only handle controlled amounts of product distributed by Level Two Agents for day-to-day operations. Security Area Level Two (2): Level two agents will have access to all level one areas, as well as access to the product receiving room, the temporary product storage room and the day of inventory room. This security clearance allows them to handle products for the day to day operations of the business. Level Two Agents are under the constant

Exhibit 19 - Security Plan

supervision of Level Three Agents. Security Level Three (3): Level three agents have the highest security clearance. Level Three access is very restricted and only given to owners, Compliance Agent in Charge, Inventory Agent in Charge, General Manager in Charge. These Agents in Charge are the only agents to have access to Restricted Access areas. These areas include the vault where the product and currency are stored, security office where the video recording and monitoring equipment is stored along with written records and documentation, product receiving/intake areas. Level three agents are responsible for the supervision of the level two and level one agents at all times. Level three agents will provide products for daily distribution.

Upon arrival for their shift, to gain access to the dispensary, staff must secure all personal belongings within their personal locker in the break room area and request their electronic key card from the Compliance Agent. Only the Compliance Agent and Security Agents have access to the employee key cards. All key cards are stored in a locked cabinet. The Compliance Agent checks the locked cabinet daily to verify that staff on duty that day have the proper identification/key card. NO key cards will leave the building at any time.

Furthermore, the keycard system tracks whenever a specific employee uses a door. These accountability measures will minimize diversion and theft. Keeping badges/keycards on site minimizes risk of theft if lost and card replacement. When the customer is ready to enter the retail sales area, the Reception Agent will use an electronic buzzer located under the reception desk to open the retail sales floor door. A certified dispenser will greet the customer and help them with their product selection. Patients and caregivers may be granted access by Dispensary personnel only upon showing a valid, unexpired and unrevoked medical cannabis card.

Applicant uses VeriScan machines to verify all ID's for every patient. Instantly identifies ID's that are not valid. VeriScan scans ID's and will verify age for all US and Canadian IDs (driver's licenses, military IDs, vehicle permits) using the camera of your phone or computer. VeriScan is a robust visitor management platform that uses ID scanning and a powerfully accurate, easy-to-use database to capture, record, compile, and verify information for every individual. Databases are completely encrypted and hosted by Rackspace and Microsoft. No one can access your data except you. We will have the ability to generate reports and view real-time data about our customers. Identity verification

procedures will prohibit sales to minors. Whether inside or outside of a dispensary, selling cannabis to a minor is a serious criminal offense and Applicant will implement measures to ensure sales to minors do not happen. The most common way a minor might attempt to purchase cannabis is by using a fraudulent I.D. Therefore, understanding how to verify identification and detect and reject fraudulent identification is so important. Agents must be vigilant and pay close attention to every single person and examine their I.D. with scrutiny. In compliance with the AMCC, licensees are prohibited from selling, giving, or distributing medical marijuana or medical marijuana products to persons under 19 years of age.

**19.7 - Exterior walls of each facility operated by the Applicant must be reinforced to withstand unlawful forcible entry. Windows, likewise, must be reinforced to prevent breakage by outside intruders.**

Applicant has acquired a stand-alone building for the Dispensary. The area occupied by the dispensing site is not to be accessible to or used by neighboring businesses, other tenants or others not employed by the Applicant. As previously stated the vaulted areas will be steel reinforced, and the exterior walls and windows will be reinforced as required by the Commission. Along with Security and Audio/Video Surveillance the Dispensary will make sure all persons are safe when they ingress and egress the premises.

**19.8 - The Applicant must maintain sufficient staffing of security guards at each facility where cannabis and medical cannabis is present to reasonably ensure the safety of the products stored therein.**

Applicant has entered into agreements to contract (1) Security Agent on premises at all times during operating hours. FCBG Security will provide security services for the Applicant during operating hours and transit of client(s). A guard team will be available on premises from open to close times and movement of VIP/principal client(s) goods and/or products. Pickups, drop offs with vendors will be secured by the security personnel in separate vehicles to cover entry, route, and exit to and from destinations. During operating

Exhibit 19 - Security Plan



hours, a premises check will be conducted once per hour to ensure principal clients, patrons, property and products are safe and secure. All patrons will be thoroughly vetted upon entry into the venue to ensure requirements are met for services. Applicant intends all on maintaining communicative relationship with local city/county law enforcement in efforts to keep the Dispensary and public as safe as possible.

**19.9 - Strict access controls shall protect areas where cannabis or medical cannabis and daily monetary receipts are handled or stored - in a secured, locked room or vault.**

Restricted Access Areas are defined on the applicant floor plan. Only staff with Level 3 clearance will have access to restricted areas. Restricted Access Areas: will be secured with a locking device that prevents access from Limited Access Areas. All Restricted Access Areas must be identified by a sign that is a minimum of 12 inches by 12 inches and that states “Do Not Enter – Restricted Access Area – Authorized Personnel Only” in letters no smaller than one inch in height. Limited Access Area: means a room or other area under the control of a cannabis dispensing organization licensed by the Commission and upon the licensed premises where cannabis sales occur with access limited to purchasers, dispensing organization owners and other dispensing organization agents, or service professionals conducting business with the dispensing organization.

Inventory and inventory movement is tracked electronically by BioTrack and METRC electronically. Applicant also will have records, journals and logs at strategic locations that coincide with the inventory movement systems. During operational hours, all products are stored in an enclosed locked room in a Restricted Access Area accessible only to specific Level 3 authorized agents. Applicant will require the Compliance Agent to work with the General Manager and Security to keep an electronic daily log of dispensing organization agents with access to the reinforced vault room. A daily electronic log of which Agents enter the room is kept for tracking purposes. The company will have written records of area access as well as verification by security access levels of authorized agents. These written records ensure accountability and are useful tools for double checking the physical and electronic inventory. Keeping an electronic daily log of dispensing organization agents with

Exhibit 19 - Security Plan

access to the reinforced vault room and knowledge of the access code or combination is a valuable security tool.

**19.10 – Protocols for beginning-of-day and end-of-day movement of medical cannabis and cash between secure areas and sales areas, as well as a plan for maintaining security of daily cash on hand at all times.**

Our Dispensary will use BioTrack POS software in house in addition to METRC software which is a State approved seed to sale tracking system. BioTrack maintains cannabis compliance by providing software tools to facilitate business intelligence, transparency, and accountability.

**Handling Currency on the Retail Floor**

At the beginning of their shift, Agents who are in charge of a Point-of-Sale system will receive a register drawer from the Level 3 Agent in Charge. The Agent in Charge will retrieve the registers from the vault. All drawers are pre-counted by the previous closing shift manager. Register drawers all start with four hundred (\$400) dollars with various monies to accommodate change that may need to be given during their shift. Agents are given a cash count sheet and are instructed to count the drawer and record all currency on the cash count sheet before beginning their shift to ensure the count is accurate. If the drawer is inaccurate, the manager will immediately inform the responsible Agent in Charge who will perform an audit and investigate the discrepancy. When the register drawer is deemed accurate, the Agent will then log into the BioTrack POS system with their individual identifying credentials. The agent will remain logged into the particular POS station that they are working from throughout the shift. If the agent needs to leave their appointed POS station at any time during their shift, they will sign out of BioTrack. This ensures that the sales are trackable and traceable and that only one agent is responsible for the appointed cash drawer at any given time. Should the agent have to leave the register during their shift for any reason, the agent will communicate this with the Agent in Charge. Agent will sign out of BioTrack and Agent in Charge will retrieve the register drawer. Agent in Charge will run a POS sales report and take the register to a Restricted Access Area to be counted for accuracy. If another agent replaces the agent that left, they will follow the same process for

working at the POS station. During the day, BioTrack will alert the agent when their register drawer currency totals more than the Company set limits, which will initially be set at one thousand dollars, and is subject to change if Applicant or security feels it pertinent. The agent will notify the Agent in Charge that they need to put register money into the drop safe located behind the POS counter, next to every POS station. The Agent in Charge will notify security. Security will, if possible, clear the retail sales floor. If this is not possible due to the volume of customers, security will proceed to the POS station. Security will put up a temporary partition to block the activity from the customer's view. While security is standing guard, agents will put the appropriate amount of money into a drop safe bag (leaving the original \$400 hundred dollars in the register). Once the drop safe bag is sealed, it cannot be reopened. All cash handling activities will be done within the view of POS station cameras. At the end of each business day, after the retail floor is closed and all customers have been cleared of the building, security will ensure all outside locks are secured and all alarms are set. At this time the Agent in Charge with level 3 clearance will retrieve any cash drops for the safe. Agent in charge will run POS end of day reports and these will be given to all POS agents along with any drop bags and cash counting sheets. Agents will perform all register cash counting at their station and within the view of POS cameras. Upon completion, Agent in Charge will collect the registers, take them to the Restricted Access Area for storage in the vault. At no time should an agent have any currency that is not pre-counted or accounted for by the POS system, BioTrack, and the Agent in Charge. This ensures that the Dispensary is able to keep accurate track and accounting methods pertaining to currency. All currency as well as cannabis products are kept in a vault.

Vault/Safe: Cannabis currency will be kept in a secure safe, located in a reinforced vault room that is securely locked and protected from unauthorized entry. The Vault area is within the Restricted Access Area and only select Level 3 security cleared agents have safe codes to enter the vault. The vault specs that would be applied are similar to the DEA's requirements for Schedule I Controlled Substances. The physical materials to be used would be the following or of comparable materials and standards: The walls, floors, and ceilings of Applicant's vault would be constructed of: at least 8 inches of reinforced concrete, 18 gauge structural studs made of galvanized sheet metal meeting requirements

of ASTM A1003, 9- gauge Type II, Class 1 Carbon steel security mesh and attachment clips meeting ASTM F1267 on either side of the studs, and an interior covered by UL and ULC classified, Type X (per ASTM C1658), impact-resistant, moisture-resistant, noncombustible gypsum board tested to ASTM E136. The walls will have a motion activated alarm, which upon unauthorized entry will transmit a signal to the security company monitoring the alarm system as well as local law enforcement agencies. The door and frame will be solid steel constructed. The entry door to the vault will also have contact switches for the alarm system. Safes: Applicant will use 3 safes within the vault. One will be solely for currency and drawers used by agents in the retail space. The other two will be for cannabis products. The storage needed will be ample to house all cannabis products needed to help our community. Applicant will be using industrial grade Liberty Safes. The specs are as follows: Safe interior is 28 cubic feet, weighs 1150 lbs, and will be bolted to the wall.

**19.11 – Members of the public, other than patients and caregivers holding a valid, unexpired, unrevoked medical cannabis card, are not allowed inside a dispensing site.**

Records, whether electronic or manual, will be kept of all persons on the premises at a facility at all times, including employees, vendors, transporters or other licensees, and all official visitors. Dispensary will have a visitor log as well as an contractor log that will record the individuals' name, date, time of ingress and egress, and (as to non-employees) and the reason for their presence. All records will be kept in a level 3 secure area for a minimum of two years, or longer at the request of the Commission or law enforcement. Only Patients and caregivers holding a valid, unexpired, unrevoked medical cannabis card are allowed entry into the dispensary. All other patrons will be considered visitors and will have to abide by the procedures set forth by the AMCC. All employees must have their Agent ID cards and may not be signed in as visitors. Anyone who is not an agent of the dispensary or an authorized inspector must be signed in as a visitor and wear appropriate badges while on the premises. Signs will be posted outside stating: Visitors, including vendors, other licensees, Commission members, inspection personnel, or other representatives must

wear a “visitor pass” or “AMCC Official” pass, as applicable, at all times while on the premises.

**19.13 – Employees, while on duty, shall wear identification badges that clearly identify them as employees.**

AMCC requires individuals who wish to work within the medical marijuana industry in Alabama to obtain a valid Agent card. A person shall not be employed or under contract by our Dispensary to perform any work, employment, or any other task for the Dispensary, without first applying for and successfully obtaining a valid card issued by the AMCC. It is the duty of each employee to comply with all the rules associated with their occupational license and to acquire it at their own cost. In addition, the employee must advise the AMCC in writing of any change in their mailing address within 10 days of any change and provide verification to the Applicant within 5 days. Failure to do so may result in disciplinary action up to and including termination. Employees at the Company are responsible for ensuring they have a valid occupational license with the Commission. Managers at the Company are responsible for ensuring that they and their staff, and any contractor they are working with are licensed with the Commission. All employees must visibly wear their identification badges at all times while on duty.

**19.14 – Visitors, including vendors, other licensees, Commission members, inspection personnel, or other representatives must wear a “visitor pass” or “AMCC Official” pass, as applicable, at all times while on the premises.**

Only Patients and caregivers holding a valid, unexpired, unrevoked medical cannabis card are allowed entry into the dispensary. All other patrons will be considered visitors and will have to abide by the procedures set forth by the AMCC. All employees must have their Agent ID cards and may not be signed in as visitors. Anyone who is not an agent of the dispensary or an authorized inspector must be signed in as a visitor and wear appropriate badges while on the premises. Signs will be posted outside stating: Visitors, including vendors, other licensees, Commission members, inspection personnel, or other representatives must

wear a “visitor pass” or “AMCC Official” pass, as applicable, at all times while on the premises.

**19.15 – The Applicant’s proposed policies to report theft, diversion, or other loss of cannabis products to the Commission and to law enforcement as early as practicable and not more than 24 hours from the event or its discovery.**

To initially secure this site and ready it for compliant and safe cannabis sales, the Dispensary is ready and willing to make a significant investment in security controls. Security will be responsible for compliance. Any person behaving in a suspicious or unlawful manner will be detained by security and if determined necessary. State law officials will be notified, and persons will be prosecuted under local and State laws. These controls consist of internal and external measures for keeping cannabis products and currency secure at all times.

**Internal Diversion and Theft Prevention Measures**

Internal diversion is most often perpetrated by employees. The most vulnerable points for diversion are typically during intake of inventory and completing customer transactions. To this end, the Applicant has developed a comprehensive Inventory Control Plan, discussed in previous detail. In an extensive effort to prevent internal diversion, the Company’s Security team will always monitor the purchaser intake process for the dispensary starting at the front door. Security and our trained Agents will have complete control over the influx rate of customers flowing into the dispensary.

Loss of Theft: If it is determined that any cannabis or infused products have been lost or have been stolen, the registered agent must report the loss or theft to their manager and the relevant authorities at once, within 24 hours. The Company shall document and report any loss or theft of cannabis or infused products from the establishment to the appropriate law enforcement agency and to the AMCC. All losses or thefts must be thoroughly investigated; employees may not be permitted to leave the facility until a full review of the security footage has been completed.

If it is determined that an employee was involved in the loss or theft that employee will be immediately terminated and reported to all relevant authorities including law enforcement

and the AMCC. All documentation regarding any theft or loss will be maintained by the Applicant for a minimum of five years after the date of the documentation and must be provided to the Commission for review upon request. The Company will try to determine where the loss has occurred, take and document corrective action, and if it is due to suspected criminal activity by an agent, report such activity to the Commission and to appropriate law enforcement. Such documentation shall be maintained for 5 years and shall be provided to the Commission for review upon request. Additionally, the manager must fill out a form located in Policies and Procedures Plan recording the loss or theft:

**19.16 – The Applicant’s verification that, upon request, it will make available to the Commission or its inspectors all information relating to the Applicant’s security plan.**

Applicant shall make available to the Commission or its inspectors any and all information relating to the Dispensary’s security plan; including, but not limited to, security alarm systems, monitoring, alarm activity, maps of camera locations and camera coverage, audio/video footage, surveillance equipment maintenance logs, authorized use lists, operation instructions, and any other security related information deemed relevant by the Commission or its inspectors.

**19.17 – Signage. The Applicant’s verification that it will prominently display at each entrance point to a dispensing site and in at least one location in the sales area of the dispensing site signs stating as follows.**

Applicant will prominently display at each entrance point to a dispensing site and in at least one location in the sales area of the dispensing site signs stating as follows:

“WARNING: This facility is monitored at all times using audio and video surveillance. Entry to this business and purchases within are strictly prohibited except as to registered patients and caregivers presenting valid identification as required by law.”

FORM G: PERSONNEL ROSTER & VERIFICATION

Le Bleu Fields

Business License Applicant Name

Dispensary

License Type

Complete the following information, current to within thirty (30) days prior to the date of application, for all personnel (each leader and employee) affiliated with the Applicant. Attach additional forms if necessary.

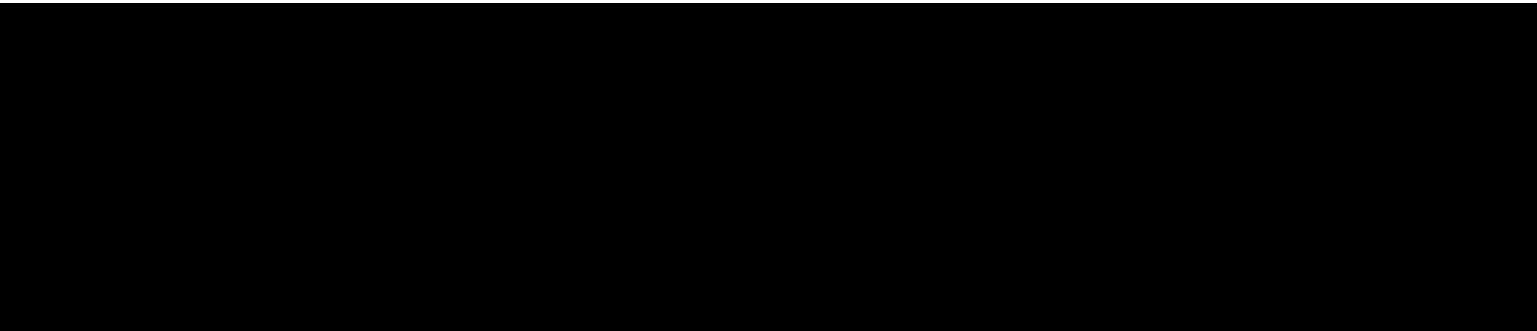
Jablonski Frazier

Owner



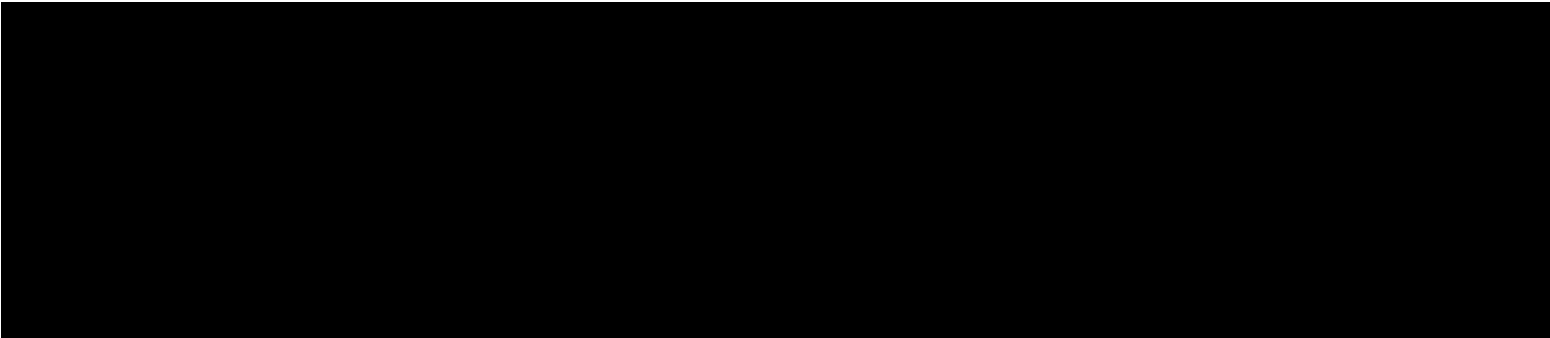
Aretha Dix

Owner



Brenda Gunsallus

Owner

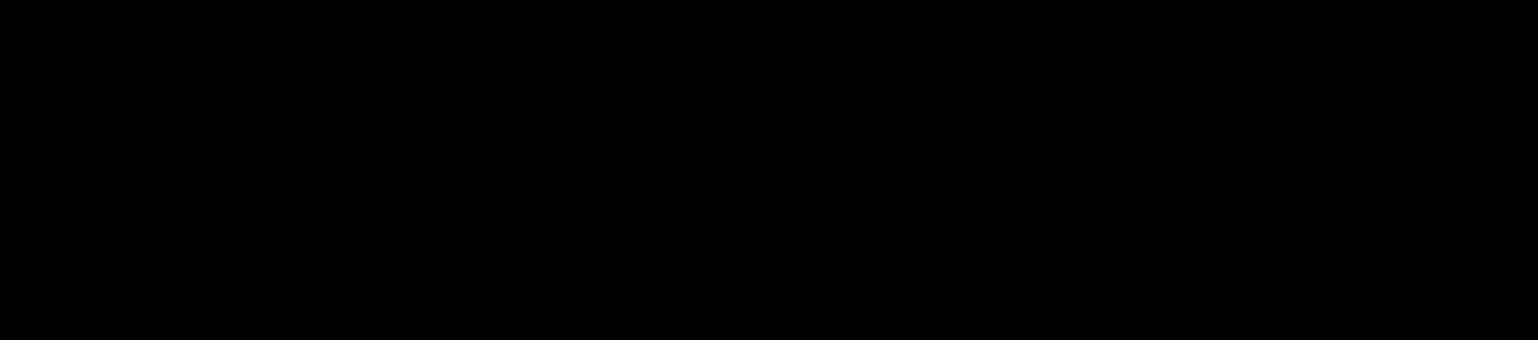


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Darlene Davis

Owner



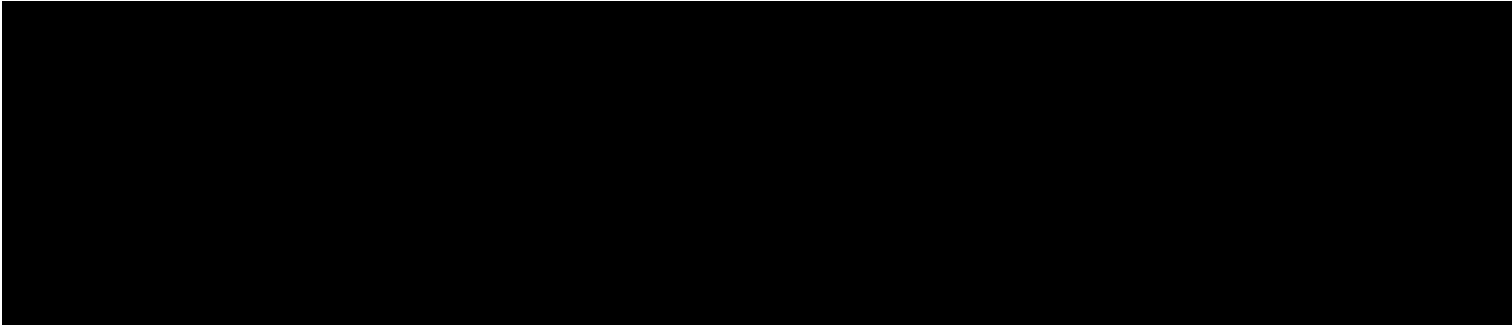
Diane Reilly

Owner



Rory Murphy

Owner



Leader/Employee Name

Title/Position

SSN

Telephone

Email

Street Address

City

State

Zip

_____ Leader/Employee Name		_____ Title/Position
_____ SSN	_____ Telephone	_____ Email
_____ Street Address		
_____ City	_____ State	_____ Zip

_____ Leader/Employee Name		_____ Title/Position
_____ SSN	_____ Telephone	_____ Email
_____ Street Address		
_____ City	_____ State	_____ Zip

_____ Leader/Employee Name		_____ Title/Position
_____ SSN	_____ Telephone	_____ Email
_____ Street Address		
_____ City	_____ State	_____ Zip

**Applicant Verification:** The undersigned hereby verifies that the information provided hereinabove (and attached, as necessary) constitutes a complete and accurate roster of personnel of the Applicant. The undersigned further verifies that, if the Applicant is issued a business license, each individual listed hereinabove (and attached, as necessary) will be registered to the AMCC website and will undergo appropriate pre-employment background checks.

Aretha Dix  
Printed Name of Verifying Individual

owner  
Title of Verifying Individual

Aretha Q. Brown-Dix  
Signature of Verifying Individual

28 Dec 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.

*Aretha Dix*  
Printed Name of Verifying Individual

*Owner*  
Title of Verifying Individual

*Aretha Q. Brown-Dix*  
Signature of Verifying Individual

*28 Dec 2022*  
Verification Date

**21.1 - A curriculum vitae for the business, demonstrating the education, experience, and other credentials of the certified dispenser(s), and any other science- or engineering based employees or employees with a business background (i.e., accounting, finance, managing, marketing, advertising, public relations, etc.) among its leadership and/or employed at each facility, including but not limited to all dispensing sites.**

**Rory Murphy** - Certified Dispenser

**Skills:**

Service medical/recreational cannabis dispensaries to assist customers with their purchases. I recommend suitable cannabis products to customers, address customers' concerns, and ensure that sales floors are adequately stocked. A strong history of interfacing with diverse clientele to recommend appropriate medical products based on individual needs. Responsible for providing accurate information on dosing and informing customers of the potential risks associated with taking cannabis

**Experience:**

Sahara Wellness, Las Vegas, NV — Certified Dispenser

June 2016 - December 2022

- Knowledge of marijuana strains and products.
- Friendly with good customer service.
- Trustworthiness and reliability.

**Education:**

University of Alabama, Tuscaloosa, AL — Finance

August 2000 - May 2004

**Other Credentials:**

OSHA Certified, BioTrack Certified, METRC Certified

**Diane Reilly** - Controller

**Skills:**

Dianne has a lifetime of experience in accounting and management with a proven record of achievements. She has experience in diverse and complex business operations including retail, real estate, education, manufacturing and distribution, engineering, not for profit and cannabis.

**Experience:**

Canopy Consulting, Walsenburg, CO — Controller

August 2015 - Present

- Start-up procedures and systems for a Las Vegas based medical dispensary
- Financial consulting for a new California based cultivation facility
- Tax liaison, compliance and reporting to the state and city

**Education:**

Society of Management of Accounts now (CPA Ontario) — CMA, CPA

August 1976 - June 1978

**Other Credentials:**

Quickbooks Specialist, ACCPAC, Auditing

**Aretha Q. Brown-Dix**, Major, USAF, Retired - General Manager

**Skills:**

Directed a diverse Medical Logistics operation. Composed of Medical Materiel, Facility Management and Biomedical Equipment repair with operating assets and annual sales in excess of \$60M. Managed 54 Medical War Reserve Materiel programs supporting 2 host and tenant organizations.

**Experience:**

Healthcare Administrator, Maxwell Air Force Base — USAF

Retired

- Provided leadership and counsel to the Air Force's Manpower Agency and the Air Force Surgeon General's agencies.

- Provided contract/credentialing oversight for 46 professional medical positions to include physicians, dentists, nurses and technicians.
- Performed detailed review of purchase requests for specialized supplies, equipment, services,

**Education:**

Master of Science in Business Administration, 2005

Faulkner University, Montgomery, AL

Bachelor of Science in Business Management, 2004

Faulkner University, Montgomery, AL

**Other Credentials:**

American Academy of Medical Administrators, Air Force Longevity Service Ribbon (4 devices)

**Brenda Gunsallus - Manager**

**Skills:**

Brenda Gunsallus has over 25 years of experience owning and operating service-related businesses. Passionate about creating a more empathetic marijuana experience, Brenda partnered with Alexandra Davis and Stacey Huffman to form Circle S Farms LLC, and Desert Aire Wellness LLC.

**Experience:**

Sahara Wellness and Cannastarz, Las Vegas, NV — Owner/General Manager

June 2014 - Current

- Responsible for daily operations including: inventory ordering and control, inventory auditing and compliance with METRC, staff training, customer relations, hiring and terminations.
- Liaison with Nevada Department of Taxation and all local governments.
- Created SOP's approved by the State of Nevada

**Education:**

Lynchburg College, Lynchburg, Virginia

Master of Science, 1984

Liberty University, Lynchburg, Virginia

Bachelor of Arts, Physical Education, 1981

**Other Credentials:**

2014 American for Safe Access Certificate, 2019 Dispensary of the Year, 2017 Best of the Best - Best Product Quality in Nevada

**Darlene Davis** - Bookkeeper / Security Manager

**Skills:**

In 2014, Alex Davis retired from the airline industry where she worked for over twenty-seven years to start her passion projects, Circle S Farms LLC, Desert Wellness Aire LLC. Alex is committed to using her law enforcement background in order to serve customers in a secure environment.

**Experience:**

Sahara Wellness and Cannastarz, Las Vegas, NV — Owner/Security Director

June 2014 - Current

- Responsible for ensuring secure operations including building and product security procedures, cash audits, vendor payments, staff training, and employee and customer safety.
- Handles \$8 to \$9 million a year in cash
- Liaison with the Las Vegas Metropolitan Police Department and other local law enforcement.

**Education:**

University of Georgia, Athens, AL

Brevard College, Brevard, NC

N.E. Georgia Police Academy

**Other Credentials:**

First female graduate to qualify as an firearms expert with a 99.6/100.

**Jablonski Frazier** - Community Engagement / Marketing

Exhibit 21 - Business Leadership Credentials

**Skills:**

Highly motivated professional with a demonstrated ability to utilize effective communication skills and technological experience to increase productivity and exceed agency goals. Recognized as an insightful leader who possesses a strong work ethic as well as abilities to troubleshoot and develop solutions while exhibiting high-caliber quality control and database management skills.

**Experience:**

Transit Director, Troy, AL — Pike Area Transit System

March 2007 - Present

- Oversees the day to day administration and operations of the City of Troy Transit System
- Correlate with different agencies to receive contracts for our Transit System
- Responsible for the database maintenance

**Education:**

Faulkner University Montgomery, Alabama

Masters in Science Management 2004

Faulkner University Montgomery, Alabama

Bachelor of Science in Computer Information Systems 2003

**Other Credentials:**

Won a 2001 National Championship at Faulkner University (NAIA) in Basketball, Made All-Academic Team my four years in college



**21.2 – A detailed explanation of the role each leader, certified dispenser, scientist, businessperson, or engineer is to have in the operation of the dispensary at each facility.**

Title: General Manager - oversees all managers, liaison with LLC attorney and AMCC

Title: Assistant General Manager - oversees managers, liaison with LLC attorney and AMCC

Title: Security Manager - for premises and employee security, handles 3rd party security vendors; oversees cash security

Title: Compliance and Training Manager - ensures employees & company meet requirements (AMCC, OSHA)

Title: Controller - financial management & control, advises GM, maintains dotted line relationship to all other managers

Title: Certified Lead Dispenser/Inventory Control - inventory intake, enters all inventory into METRC, updates data, maintains destruction records

Title: Community Liaison - interacts with the community spreading information about the medicinal properties of cannabis.

**21.3 – A 5-year hiring plan for its employees, identifying the types, positions, required education, required experience, and expected roles of such personnel.**

Applicant has qualified staff to operate as soon as the Dispensary commences business.

These roles and descriptions are listed above. As a company we will expand as rapidly as the need arises and will open by year 3 an additional 2 stores.

Our hiring plan consists of training incoming employees as the patient number grows. We will add:

**General Managers** - The general manager is in charge of the day-to-day operations of the dispensary.

**Certified Dispensers** - the most consumer-facing role on a dispensary team, making it important to hire someone skilled in managing customer interactions. People who come

from retail or service backgrounds tend to do well in this role. Education requirements will vary depending on the potential employee.

**Inventory Managers** - there's going to be a high volume of cannabis product that comes through our dispensaries — all of which needs to be meticulously managed, tracked, and documented. That's where the inventory manager comes in. This hire will take charge of receiving, stocking, distributing, and tracking inventory. They ensure every product that comes through your door is properly accounted for and reported. Previous experience with detailed inventory systems will be required to fill these positions.

**Security Personnel** - Dispensaries are, for the most part, cash businesses. That means you're going to have a lot of cash on hand at any given time, making your dispensary a clear target for opportunistic criminals — which is why it's so important to have security on-site. Having security on your team protects your staff, your customers, your product, and your investment. Not only will it deter any potential thieves from targeting your dispensary, it will also help protect you from any internal security issues (like stolen inventory). Previous Security experience will be required of applicants.

**Receptionist/Greeter** - You only get one chance to make a first impression, which is why the receptionist/greeter is such an important role. Whether over the phone or in person, your receptionist or greeter is going to be a customer's first introduction to your dispensary, so it's important to hire the right person and make sure the introduction is a positive one.

**Compliance Manager** - Compliance is crucial for cannabis dispensaries. You must get the right certifications and licenses, maintain proper financial records, and submit inventory and seed-to-sale tracking information to the necessary authorities. The compliance officer/operations manager is responsible for making sure the dispensary stays compliant with all local and state laws and regulations. They're also responsible for staying on top of any changes to applicable laws and adjusting dispensary policies and procedures accordingly.

**Cannabis Delivery Driver** - If cannabis delivery becomes legal in Alabama, hiring a cannabis delivery driver can help you get product into more cannabis consumers' hands. We will make sure to hire someone with a clean driving record (which is a must for

insurance reasons), reliable transportation, and trust handling large quantities of both product and cash.

**Human Resources Manager** - As our dispensary grows, so will our staff. Hiring a dedicated human resources manager is the best way to facilitate that growth. HR managers are responsible for onboarding new staff members, running background checks, facilitating training, maintaining HR paperwork, payroll, and managing benefit programs. Anyone with a background in human resources could be successful in this role — but someone with an interest in cannabis and/or experience would be ideal.

**Marketing Manager** - the cannabis business is a competitive one and if you want to grab your ideal customers' attention, you need the right marketing strategy. There are strict laws about how you can and can not market a dispensary, so hiring a marketing manager with experience in the cannabis industry is a great way to drive business into our dispensaries and avoid any potential compliance issues.

**Brand Ambassador** - If there are cannabis influencers in our city, partnering with them for influencer marketing campaigns (essentially making them a brand ambassador for our dispensary) can help drive people into our Dispensary.

**IT Professional** - With the increasing amount of technology entering the cannabis industry, it's important to make sure everything is working correctly. An IT professional can help you troubleshoot day-to-day tech problems and also streamline the best tech partners for your unique dispensary needs.

Here are a few general dispensary hiring tips to keep in mind as you're sourcing, interviewing, and hiring your team:

- Experience isn't everything. Cannabis is an emerging industry, so not everyone we interview is going to have direct experience in the cannabis space, but that doesn't mean they wouldn't be a slam dunk for the role or your team.
- Instead of focusing on cannabis experience or job title during the hiring process (which great candidates may or may not have), look for relevant skills, transferable experience, and candidates who would be a good culture fit.
- If you want to attract and retain the best dispensary associates, we will make our dispensary a place people want to work. Offer benefits, invest in employee training

and onboarding, and cultivate an environment that makes our team excited to go to work.

- Post in the right places. Mainstream job resources, like Indeed and LinkedIn, can be a great resource for job posting and finding quality candidates. But in addition to tapping mainstream resources, we will also post any open roles on cannabis and medical marijuana industry-specific job boards. Some of the most visible cannabis boards for job postings include: Vangst, Leafbuyer, 420JobsBoard, Cannabis.net, 420Careers, Cannabis Business Times
- Tap into our network. The best hires often come from personal recommendations, so tapping our network (including our current staff) is a great place to find the best talent for our dispensary.
- Sponsor, host, or exhibit at a cannabis career event. Just like traditional job fairs, there are cannabis job fairs, and as the industry grows, these hiring events will just become more frequent. We will get involved — either as a sponsor, host, exhibitor, or attendee — and use these events to find quality candidates for your dispensary hiring.
- Compliance first. AMCC has specific laws about who can and can not work in a dispensary as well as specific processes and procedures you need to follow during the hiring process.
- Make sure you understand any relevant hiring laws, rules, or regulations — and make sure you follow them.

Ultimately, our dispensary's success hinges on our team. So we will get out there and find the best talent to make our dispensary an asset to our community and patients.

## Exhibit 22 - Employee Handbook Summary

### 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.

*Aretha Dix*

Printed Name of Verifying Individual

*owner*

Title of Verifying Individual

*Aretha L. Brown-DNP*

Signature of Verifying Individual

*28 Dec 2022*

Verification Date

**If Employee Handbook exceeds 25 pages, then a summary of the handbook, not to exceed 5 pages, is required**

This employee handbook is designed to acquaint you with Le Bleu Fields and provide you with information and expectations regarding working conditions, the basic rules and regulations relating to the marijuana industry, benefits, and policies affecting your employment. It is our expectation that employees function within the policies as outlined in this handbook.

**1.2 EMPLOYMENT RELATIONSHIP**

You enter into employment voluntarily, and you are free to resign at any time for any reason or no reason. Similarly, Le Bleu Fields is free to conclude its relationship with any employee at any time for any reason or no reason.

**1.3 OCCUPATIONAL LICENSES REQUIRED**

Alabama requires individuals who wish to work within the medical marijuana industry to obtain a valid license issued by the state. A person shall not be employed or under contract by Le Bleu Fields to perform any work, employment, or any other task for Le Bleu Fields, without first applying for and successfully obtaining a valid license issued by the state.

**3.1 NON-DISCRIMINATION**

In order to provide equal employment and advancement opportunities to all individuals, employment decisions at LeBleu Fields are based on merit, qualifications, and abilities. Le Bleu Fields does not discriminate in employment opportunities or practices because of race, color, religion, sex, national origin, age or disability.

**3.2 NON-DISCLOSURE/CONFIDENTIALITY/HIPAA**

The protection of confidential business information and trade secrets is vital to the interests and success of LeBleu Fields. "HIPAA" stands for the Health Insurance Portability and Accountability Act ensures that personal medical information shared with doctors, hospitals, and others who provide and pay for healthcare is protected.

**3.6 PERSONNEL DATA CHANGES**

It is the responsibility of each employee to promptly notify their supervisor or of any changes in personnel data such as:

- Mailing address, Telephone numbers, Name and number of dependents, and Emergency Contact information.

### **3.8 PERFORMANCE EVALUATION**

An employee's first performance review will take place after successful completion of the probationary period, the employee will receive a 90-day performance evaluation. Thereafter, performance reviews will normally be conducted annually.

### **3.9 CORRECTIVE ACTION**

The usual sequence of corrective actions includes an oral warning, a written warning, probation, and finally termination of employment. In deciding which initial corrective action would be appropriate, a supervisor will consider the seriousness of the infraction, the circumstances surrounding the matter, and the employee's previous record.

### **3.10 SAFETY**

Each employee is expected to obey safety rules and exercise caution and common sense in all work activities. Employees must immediately report any unsafe conditions to their supervisor.

### **3.14 BUILDING SECURITY**

All employees who are issued keys, alarm codes or other access through security to the office are responsible for their safekeeping.

### **3.17 VISITORS IN THE WORKPLACE**

To provide for the safety and security of employees, visitors, and the facilities at LeBleu Fields, only authorized visitors are allowed in the workplace.

### **3.18 IMMIGRATION LAW COMPLIANCE**

LeBleu Fields employs only United States citizens and those non-U.S. citizens authorized to work in the United States in compliance with the Immigration Reform and Control Act of 1986.

LeBleu Fields takes the Standards of Conduct seriously. All employees must be familiar with these rules and standards, and those of the Alabama Medical Cannabis Commission (AMCC). In addition, employees are expected to follow the rules and standards in doing their jobs and conducting LeBleu Fields' business.

### **4.1 ATTENDANCE/PUNCTUALITY**

LeBleu Fields expects that every employee will be regular and punctual in attendance. This means being in the office/workplace, ready to work at their starting time each day.

#### **4.3 HARASSMENT-FREE WORKPLACE**

LeBleu Fields is committed to providing a work environment that is free of discrimination and unlawful harassment. Actions, words, jokes, or comments based on an individual's sex, race, ethnicity, age, religion, or any other legally protected characteristic will not be tolerated.

#### **4.7 SUBSTANCE ABUSE**

The manufacture, distribution, possession, sale, or purchase of controlled substances of abuse on Company property is prohibited. This includes the illegal manufacture, distribution, possession, sale, or purchase of marijuana.

#### **4.8 TOBACCO PRODUCTS**

The use of tobacco products is permitted only in the designated outdoor areas and must be disposed of in designated areas.

#### **4.9 WEAPONS POLICY**

Employees may not, at any time while on any property owned, leased or controlled by LeBleu Fields LLC, including anywhere that company business is conducted.

#### **4.10 INTERNET USE**

LeBleu Fields employees are allowed use of the Internet and email to conduct LeBleu Fields's business. Social media post accounts will be managed by the General Manager and or their designee. Employees may not post, go live, and/or tag LeBleu Fields without prior approval of LeBleu Fields management. Employees must adhere to social media policy.

#### **5.1 UNLAWFUL ACTS**

A representative of LeBleu Fields shall not buy, sell, transfer, give away, or acquire medical marijuana except as allowed pursuant Rules outlined by the AMCC.

A representative of LeBleu Fields shall not offer for sale or solicit an order for medical marijuana in person except within the licensed premises and shall not have in possession or upon the licensed premises any medical marijuana, the sale of which is not permitted by the license.



A Certified Physician who makes patient referrals to a licensed medical marijuana center shall not receive anything of value from the medical marijuana center licensee or its agents, servants, officers, or owners or anyone financially interested in the licensee.

## **5.2 DUTY TO REPORT OFFENSES**

Any employee, and any associated or key persons to a licensee, must make written notification to the AMCC of any criminal conviction and criminal charge pending against such person within ten (10) days of such person's arrest, summons, or conviction.

## **6.1 PAY EQUITY**

The company is committed to fair pay practices and equal pay. We commit to assign consistent wages regardless of an employee's gender, race, national origin, citizenship or any other protected status.

## **6.2 TIMEKEEPING**

Accurately recording time worked is the responsibility of every non-exempt employee. Time worked is the time actually spent on a job(s) performing assigned duties.

## **6.4 PAYDAYS**

All employees are paid every other Friday, 26 pay periods/year.

## **6.5 PAY DEDUCTIONS**

LeBleu Fields will deduct federal and state income taxes, social security and Medicare/Medicaid taxes, insurance elections, garnishments and other authorized deductions from an employee's gross pay.

## **7.5 PAID TIME OFF**

LeBleu Fields provides paid time off (PTO) to full time employees to attend to personal matters and for vacation

Always be fair and courteous to fellow associates, customers, members, vendors or people who work on behalf of LeBleu Fields

## 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.

*Aretha Dix*

Printed Name of Verifying Individual

Individual

*Owner*

Title of Verifying

*Aretha Q. Brown-Dix*

Signature of Verifying Individual

*28 Dec 2022*

Verification Date

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## **SECTION 1**

### **INTRODUCTION**

This employee handbook is designed to acquaint you with Le Bleu Fields and provide you with information and expectations regarding working conditions, the basic rules and regulations relating to the marijuana industry, benefits, and policies affecting your employment. It is our expectation that employees function within the polices as outlined in this handbook.

The information contained in this employee manual applies to all employees of Le Bleu Fields. Following the policies described in this employee handbook is considered a condition of continued employment. However, nothing in this employee handbook alters an employee's status. The contents of this employee handbook shall not constitute nor be construed as a promise of employment or as a contract between Le Bleu Fields and any of its employees.

The employee handbook is a summary of our policies, which are presented here only as a matter of information.

You are responsible for reading, understanding, and complying with the provisions of this employee handbook.

#### **1.1 EMPLOYMENT APPLICATIONS**

Any misrepresentations, falsifications, or material omissions in any of this information or data may result in exclusion of the individual from further consideration for employment or, if the person has been hired, termination of employment.

## **1.2 EMPLOYMENT RELATIONSHIP**

You enter into employment voluntarily, and you are free to resign at any time for any reason or no reason. Similarly, Le Bleu Fields is free to conclude its relationship with any employee at any time for any reason or no reason.

## **1.3 OCCUPATIONAL LICENSES REQUIRED**

Alabama requires individuals who wish to work within the medical marijuana industry to obtain a valid license issued by the state. A person shall not be employed or under contract by Le Bleu Fields to perform any work, employment, or any other task for Le Bleu Fields, without first applying for and successfully obtaining a valid license issued by the state. It is the duty of each employee to comply with all the rules associated with their cannabis license and to acquire it at their own cost. In addition, the employee must advise the state in writing of any change in their current mailing address within 10 days of any change and provide verification to Le Bleu Fields within 5 days. Failure to do so may result in disciplinary action up to and including termination.

Employees at Le Bleu Fields are responsible for ensuring that they have a valid cannabis license with the state. Managers at Le Bleu Fields are responsible for ensuring that they and their staff, and any contractor they are working with are licensed. Failure to do so may result in disciplinary action up to and including termination.

## **SECTION 2**

### **DEFINITIONS OF EMPLOYEES STATUS**

#### **“EMPLOYEES” DEFINED**

Le Bleu Fields follow the policies, definitions, and practices outlined by the Fair Labor Standards Act. The Fair Labor Standards Act (FLSA) is a federal law that

ensures employees are treated fairly and are accurately compensated for their time worked. It is enforced by the US Department of Labor. The FLSA distinguishes work as non-exempt and exempt and establishes standards for minimum wage, overtime pay, recordkeeping, and child labor. The University administers compensation in compliance with the FLSA.

Employees of LeBleu fields may review the Department of Labors definitions to understand their employment category and other information pertaining to their rights as an employee.

An “employee” of LeBleu Fields is a person who regularly works for LeBleu Fields on a wage or salary basis. “Employees may include exempt, non-exempt, regular full-time, regular part-time, and temporary persons, and others employed with Le Bleu Fields who are subject to the control and direction of Le Bleu Fields in the performance of their duties.

## **SECTION 3**

### **EMPLOYMENT POLICIES**

#### **3.1 NON-DISCRIMINATION**

In order to provide equal employment and advancement opportunities to all individuals, employment decisions at LeBleu Fields are based on merit, qualifications, and abilities. Le Bleu Fields does not discriminate in employment opportunities or practices because of race, color, religion, sex, national origin, age or disability.

LeBleu Fields will make reasonable accommodations for qualified individuals with known disabilities unless doing so would result in an undue hardship. This policy

governs all aspects of employment, including selection, job assignment, compensation, discipline, termination, and access to benefits and training.

Employees with questions or concerns about discrimination in the workplace are encouraged to bring these issues to the attention of their supervisor. Employees can raise concerns and make reports without fear of reprisal. Anyone found to be engaging in unlawful discrimination will be subject to disciplinary action, including termination of employment.

### **3.2 NON-DISCLOSURE/CONFIDENTIALITY/HIPAA**

The protection of confidential business information and trade secrets is vital to the interests and success of LeBleu Fields. "HIPAA" stands for the Health Insurance Portability and Accountability Act ensures that personal medical information shared with doctors, hospitals, and others who provide and pay for healthcare is protected. Basically, the HIPAA Privacy Rule does the following: (a) Imposes restrictions on the use and disclosure of personal health information,(b) Gives clients greater access to their medical records, and(c) Gives clients greater protection of the medical records. The patients' rights to access and control his or her "protected health information". Such confidential information includes, but is not limited to, the following :

- Compensation information,
- Financial information,
- Marketing strategies,
- Pending projects and proposals,
- Proprietary production processes,
- Personnel/Payroll records,
- Conversations between any persons associated with Le Bleu Fields, and
- Patient information



Employees who improperly use or disclose trade secrets, patient information or confidential business information will be subject to disciplinary action, up to and including termination of employment and legal action, even if they do not actually benefit from the disclosed information.

Any representative of LeBleu Fields who discloses releases or makes public a patient's medical record or any confidential information contained in any such record that is provided to or by the business without the written authorization of the patient commits a class 1 misdemeanor; except that the owner, officer, or employee shall release the records or information upon request by the state or local medical marijuana licensing authority.

### **3.3 PROBATIONARY PERIOD FOR NEW EMPLOYEES**

The probationary period for regular full-time and regular part-time employees lasts up to 90 days from date of hire.

Upon satisfactory completion of the probationary period, the employee's status will change from Temporary to Regular. All employees, regardless of classification or length of service, are expected to meet and maintain Company standards for job performance and behavior (See Section 4, Standards of Conduct).

### **3.4 BREAKS (REST AND MEAL)**

#### **MEAL PERIOD/REST PERIOD**

Employees shall be entitled to an uninterrupted and duty-free meal period of 30-minute duration when the shift exceeds five consecutive hours of work. Le Bleu Fields will comply with all FLSA practices regarding lunches and breaks.

### **3.5 PERSONNEL FILES**

Employee personnel files may include the following: cannabis badge, W-4, I-9, Job Application, Resume, training events history, payroll records, records of disciplinary action and documents related to employee performance reviews, coaching, and mentoring.

Personnel files are the property of Le Bleu Fields and access to the information is restricted. Management personnel of Le Bleu Fields who have a legitimate reason to review the file are allowed to do so.

### **3.6 PERSONNEL DATA CHANGES**

It is the responsibility of each employee to promptly notify their supervisor or of any changes in personnel data such as:

- Mailing address, Telephone numbers, Name and number of dependents, and Emergency Contact information.

An employee is responsible for updating their personnel data and it should be accurate and current at all times.

### **3.7 INCLEMENT WEATHER/EMERGENCY CLOSINGS**

At times, emergencies such as severe weather, fires, or power failures can disrupt company operations. The decision to close the office will be made by the executive staff.

When the decision is made to close LeBleu Fields, employees will receive official notification from their supervisor.

Time off from scheduled work due to emergency closings will be unpaid for all non-exempt employees.

### **3.8 PERFORMANCE EVALUATION**

An employee's first performance review will take place after successful completion of the probationary period, the employee will receive a 90-day performance evaluation. Thereafter, performance reviews will normally be conducted annually. All performance reviews will be completed in writing by your supervisor or manager on the form designated by LeBleu Fields and reviewed during a conference with you. Factors considered in your review include the quality of your job performance, your attendance, meeting the requirements of your job description, dependability, attitude, cooperation, compliance with LeBleu Fields employment policies, any disciplinary actions, and year-to-year improvement in overall performance. Compensation increases are given by LeBleu Fields at its discretion in consideration of various factors, including your performance review. Wage increases are not necessarily granted after every performance appraisal.

### **3.9 CORRECTIVE ACTION**

The usual sequence of corrective actions includes an oral warning, a written warning, probation, and finally termination of employment. In deciding which initial corrective action would be appropriate, a supervisor will consider the seriousness of the infraction, the circumstances surrounding the matter, and the employee's previous record.

There are times when an infraction is so severe that the progressive approach is not utilized in order. These include but are not limited to: violation of Alabama's cannabis regulations, theft in any form, insubordinate behavior, vandalism or destruction of company property, unauthorized presence on property during non-business hours, the use of company equipment and/or company vehicles without prior authorization by executive staff, untruthfulness about personal work history, skills, or training, divulging Company business practices, and

misrepresentations of LeBleu Fields to a customer, a prospective customer, the general public, or an employee. This is not an exhaustive list.

### **3.10 SAFETY**

Each employee is expected to obey safety rules and exercise caution and common sense in all work activities. Employees must immediately report any unsafe conditions to their supervisor. Employees who violate safety standards, cause hazardous or dangerous situations, or fail to report, or where appropriate, remedy such situations, may be subject to disciplinary action including termination of employment.

In the case of an accident that results in injury, regardless of how insignificant the injury may appear, employees should notify their supervisor immediately. (See Section 3.18, Employee Requiring Medical Attention).

### **3.11 HEALTH RELATED ISSUES**

Employees who become aware of any health-related issue should notify their supervisor of health status. This policy has been instituted strictly to protect the employee.

A written “permission to work” from the employee’s doctor is required at the time or shortly after notice has been given. The doctor’s note should specify whether the employee is able to perform regular duties as outlined in his/her job description.

### **3.12 EMPLOYEE INJURY OR ILLNESS REQUIRING MEDICAL ATTENTION**

In the event an employee requires medical attention, whether injured or becoming ill while at work, the employee must notify a supervisor immediately. If it is necessary for the employee to be seen by the doctor or go to the hospital, a family member will be called to transport the employee to the appropriate facility. If an emergency arises requiring Emergency Medical Services to evaluate the injury/illness of an employee on-site, the employee will be responsible for any transportation charges. Furthermore, LeBleu Fields's employees will not be responsible for transportation of another employee due to liabilities that may occur. A physician's "return to work" notice may be required.

### **3.13 WORKPLACE ACCOMMODATIONS FOR NURSING MOTHERS**

LeBleu Fields shall provide reasonable paid break time, each day to allow the employee to express breast milk for her nursing child for up to two years after the child's birth. Le Bleu Fields shall make reasonable efforts to provide a room or other location close to the work area, where an employee can express breast milk in privacy.

### **3.14 BUILDING SECURITY**

All employees who are issued keys, alarm codes or other access through security to the office are responsible for their safekeeping. The last employee, or a designated employee, who leaves the building at the end of the business day assumes the responsibility to ensure that all doors are securely locked, the alarm system is armed, thermostats are set on appropriate evening and/or weekend setting, and all appliances and lights are turned off with exception of the lights normally left on for security purposes. Employees are not allowed on Company property after hours without prior authorization from their supervisor.

### **3.15 INSURANCE ON PERSONAL EFFECTS**

All employees should be sure that their own personal insurance policies cover the loss of anything occasionally left at the office/workplace. LeBleu Fields assumes no risk for any loss or damage to personal property.

### **3.16 SUPPLIES; EXPENDITURES; OBLIGATING LEBLEU FIELDS**

Only authorized persons may purchase supplies in the name of LeBleu Fields. No employee whose regular duties do not include purchasing shall incur any expense on behalf of LeBleu Fields or bind LeBleu Fields by any promise or representation without written approval. With prior approval from a supervisor, an employee may use petty cash for a small LeBleu Fields supply purpose. The employee must bring a receipt matching the purchase and turn it in. Failure to bring a receipt may result in the employee reimbursing the company for the purchase.

### **3.17 VISITORS IN THE WORKPLACE**

To provide for the safety and security of employees, visitors, and the facilities at LeBleu Fields, only authorized visitors are allowed in the workplace. Restricting unauthorized visitors helps ensure security, decreases insurance liability, protects confidential information, safeguards employee welfare, and avoids potential distractions and disturbances. Visitors are not allowed in limited access areas as defined by Alabama statutes unless they receive a visitor's badge from an employee and are authorized vendors.

Any employee allowing a visitor in the limited access area is required to give the visitor a visitor badge, have that visitor sign in for the badge, have the visitor sign out the badge when they are finished, and collect the badge when the visitor leaves. Failure to do so will result in disciplinary action up to and including termination.

### **3.18 IMMIGRATION LAW COMPLIANCE**

LeBleu Fields employs only United States citizens and those non-U.S. citizens authorized to work in the United States in compliance with the Immigration Reform and Control Act of 1986.

Each new employee, as a condition of employment, must complete the Employment Eligibility Verification Form I-9 and present documentation establishing identity and employment eligibility. Former employees who are rehired must also complete the form if they have not completed an I-9 with LeBleu Fields within the past three years or if their previous I-9 is no longer retained or valid.

## **SECTION 4**

### **STANDARDS OF CONDUCT**

LeBleu Fields takes the Standards of Conduct seriously. All employees must be familiar with these rules and standards, and those of the Alabama Medical Cannabis Commission (AMCC). In addition, employees are expected to follow the rules and standards in doing their jobs and conducting LeBleu Fields' business. Please note that any employee who deviates from these rules and standards will be subject to corrective action, up to and including termination of employment.

While not intended to list all the forms of behavior that are considered unacceptable in the workplace, the following are examples of rule infractions or misconduct that may result in disciplinary action, including termination of employment.

- Failure to comply with these rules and the rules of AMCC.
- Any drug or alcohol use on Company property.
- Possession of paraphernalia.

- Theft or inappropriate removal or possession of property.
- Falsification of timekeeping records (See Section 6.2, Timekeeping);
- Working under the influence of alcohol or illegal drugs (See Section 4.6, Substance Abuse).
- Possession, distribution, sale, transfer, or use of alcohol or illegal drugs in the workplace (See Section 4.6, Substance Abuse).
- Fighting or threatening violence in the workplace.
- Boisterous or disruptive activity in the workplace.
- Negligence or improper conduct leading to damage of company-owned or customer-owned property.
- Insubordination or other disrespectful conduct.
- Violation of safety or health rules.
- Smoking in the workplace.
- Sexual or other unlawful or unwelcome harassment (See Section 4.3, Harassment, Including Sexual Harassment).
- Excessive absenteeism or any absence without notice (See also, Section 4.1 Attendance/Punctuality and 4.2, Absence without Notice).
- Unauthorized use of telephones, or other company-owned equipment (See Section 4.4, Telephone Use).
- Using company equipment for purposes other than business.
- Unauthorized disclosure of business “secrets” or confidential information.
- Violation of personnel policies; and
- Unsatisfactory performance or conduct.

#### **4.1 ATTENDANCE/PUNCTUALITY**

LeBleu Fields expects that every employee will be regular and punctual in attendance. This means being in the office/workplace, ready to work at their starting time each day.



In the rare instance when you cannot avoid being late for work, or are unable to work as scheduled, you are required to notify your manager **2 hours in advance of the anticipated tardiness or absence.**

- Texting or messaging your manager will not be accepted. You must call your manager directly.
- Texting or messaging a coworker will not be accepted.

Should a pattern of tardiness become evident, disciplinary action may occur up to and including termination.

Attendance at mandatory company meetings is essential for the success of the company. These meetings are considered part of scheduled shifts and all attendance and tardiness policies apply.

#### **4.2 ABSENCE WITHOUT NOTICE**

If you do not report for work and LeBleu Fields is not notified of your status, it will be assumed after two consecutive days of absence that you have resigned, and you will be separated from your employment with LeBleu Fields.

#### **4.3 HARASSMENT-FREE WORKPLACE**

LeBleu Fields is committed to providing a work environment that is free of discrimination and unlawful harassment. Actions, words, jokes, or comments based on an individual's sex, race, ethnicity, age, religion, or any other legally protected characteristic will not be tolerated.

If you believe you have been the victim of harassment, or know of another employee who has, report it to a supervisor and/or human resources representative

immediately. Employees can raise concerns and make reports without fear of reprisal.

Any supervisor who becomes aware of possible harassment should promptly advise their supervisor who will handle the matter in a timely and confidential manner.

#### **4.5 TELEPHONE USE**

Personal usage during business hours is discouraged. All personal telephone calls and text should be kept brief. Reserve your social media for your break time.

#### **4.6 DRESS CODE**

A professional appearance is important anytime. Employees are expected to dress in casual attire unless the day's task requires otherwise. Employees must always present a clean, professional appearance. Everyone is expected to be well-groomed and wear clean clothing.

- Clothing that reveals too much cleavage, your back, chest, stomach, or undergarments is not appropriate for a place of business – even in a casual setting.
- Any clothing that has words, terms, or pictures that may be offensive to others is unacceptable.
- Short shorts, skirts, and/or dresses are not appropriate. Employees working directly with patients should always dress in clothing appropriate for a retail establishment catering to patients.
- Employees working indirectly with patients should dress appropriately for their job responsibilities keeping safety in mind

#### **4.7 SUBSTANCE ABUSE**

LeBleu Fields is committed to providing a safe and productive workplace for its employees. In keeping with this commitment, the following rules regarding alcohol and drugs of abuse have been established for all staff members, regardless of rank or position, including both regular and temporary employees. The rules apply during working hours to all employees of LeBleu Fields while they are on Company premises or elsewhere on Company business.

The manufacture, distribution, possession, sale, or purchase of controlled substances of abuse on Company property is prohibited. This includes the illegal manufacture, distribution, possession, sale, or purchase of marijuana.

Being impaired by illegal drugs, alcohol, or substances of abuse on Company property is prohibited.

Working while under the influence of prescription or recommended drugs that impair performance is prohibited.

So that there is no question about what these rules signify, please note the following definitions:

Company property: All Company owned or leased property used by employees.

Controlled substance of abuse: Any substance listed in Schedules I-V of Section 202 of the Controlled Substance Act, as amended.

Drug: Any chemical substance that produces physical, mental, emotional, or behavioral change in the user.

Drug paraphernalia: Equipment, a product, or material that is used or intended for use in concealing an illegal drug, or otherwise introducing into the human body an illegal drug or controlled substance.

Illegal drug:

- a. Any drug or derivative thereof whose use, possession, sale, transfer, attempted sale or transfer, manufacture, or storage is illegal or regulated under any federal, state, or local law or regulation.
- b. Any drug, including – but not limited to – a prescription or recommended drug, used for any reason other than that prescribed or recommended by a physician.
- c. Inhalants used illegally.

Under the influence: A state of not having the normal use of mental or physical faculties resulting from the voluntary introduction into the body of an alcoholic beverage, drug, or substance of abuse.

Consistent with the rules listed above, any of the following actions constitutes a violation of LeBleu Fields's policy on drugs and may subject an employee to disciplinary action, up to and including immediate termination.

Using, selling, purchasing, transferring, manufacturing, or storing an illegal drug or drug paraphernalia, or attempting to or assisting another to do so, while in the course of employment.

Working or reporting to work, conducting Company business or being on Company property while under the influence of an illegal drug or alcohol, or in an impaired condition.

#### **4.8 TOBACCO PRODUCTS**

The use of tobacco products is permitted only in the designated outdoor areas and must be disposed of in designated areas.

#### **4.9 WEAPONS POLICY**

Employees may not, at any time while on any property owned, leased or controlled by LeBleu Fields LLC, including anywhere that company business is conducted, such as customer locations, client locations, trade shows, restaurants, company event venues, and so forth, possess or use any weapon.

Weapons include, but are not limited to, guns, knives or swords with blades over four inches in length, explosives, and any chemical whose purpose is to cause harm to another person.

Regardless of whether an employee possesses a concealed weapons permit (CCW) or is allowed by law to possess a weapon, weapons are prohibited on any company property. They are also banned in any location in which the employee represents the company for business purposes, including those listed above.

Employees who violate this policy will be subject to disciplinary action up to and including employment termination.

#### **4.10 INTERNET USE**

LeBleu Fields employees are allowed use of the Internet and email to conduct LeBleu Fields's business. Social media post accounts will be managed by the General Manager and or their designee. Employees may not post, go live, and/or tag LeBleu Fields without prior approval of LeBleu Fields management. Employees must adhere to social media policy.

Employees may use the Internet when appropriate to access information needed to conduct business at LeBleu Fields. Employees may use email when appropriate for Company business correspondence.

Personal use of the Internet on LeBleu Fields's computer network is strictly prohibited. Use of the Internet must not interfere with an employee's productivity.

Employees are responsible for using the Internet in a manner that is ethical and lawful.

Internet messages are public and not private. LeBleu Fields reserves the right to access and monitor all files and messages on its systems.

### SECTION 5

#### **5.1 UNLAWFUL ACTS**

AMCC defines a number of unlawful acts specific to the medical marijuana industry. The following list highlights a number of rules that LeBleu Fields wants their employees to strictly adhere to; however, this is just the highlights and not the complete list of expectations.

It is unlawful for any person licensed to sell medical marijuana to a person not licensed by the AMCC or to a person not able to produce a valid patient registry identification card, unless the person has a copy of a current and complete new (not a renewal) application for the medical marijuana registry administered by the state.

A representative of LeBleu Fields shall not consume medical marijuana in a licensed medical marijuana facility, and it shall be unlawful for a medical marijuana licensee to allow medical marijuana to be consumed upon its licensed premises.

LeBleu Fields and its employees shall not with knowledge, permit or fail to prevent the use of his or her registry identification by any other person for the unlawful purchasing of medical marijuana.

A representative of LeBleu Fields shall not buy, sell, transfer, give away, or acquire medical marijuana except as allowed pursuant Rules outlined by the AMCC.

A representative of LeBleu Fields shall not be within a limited-access area unless the person's license badge is prominently displayed above the waist.

A representative of LeBleu Fields shall not provide public premises, or any portion thereof, for the purpose of consumption of medical marijuana in any form.

Nor shall a representative of LeBleu Fields sell medical marijuana to a person not licensed pursuant to AMCC regulations or to a person not able to produce a valid patient registry identification card.

A representative of LeBleu Fields under twenty-one years of age shall not be employed to sell or dispense medical marijuana at a medical marijuana center.

If a representative of LeBleu Fields has reasonable cause to believe that a person is exhibiting a fraudulent patient registry identification card in an attempt to obtain

medical marijuana, the licensee or employee shall be authorized to confiscate the fraudulent patient registry identification card, if possible, and shall, within forty-eight hours after the confiscation, turn it over to the state or local law enforcement agency. The failure to confiscate the fraudulent patient registry identification card or to turn it over to the state after the confiscation shall **not** constitute a criminal offense.

A representative of LeBleu Fields shall not offer for sale or solicit an order for medical marijuana in person except within the licensed premises and shall not have in possession or upon the licensed premises any medical marijuana, the sale of which is not permitted by the license. A representative of LeBleu Fields shall not buy medical marijuana from a person not licensed to sell per AMCC. A representative of LeBleu Fields shall not sell medical marijuana except in the permanent location specifically designated in the license for sale. A representative of LeBleu Fields shall not have on the licensed premises any medical marijuana or marijuana paraphernalia that shows evidence of the medical marijuana having been consumed or partially consumed. A representative of LeBleu Fields shall not deliver medical marijuana to any premises other than the specific licensed premises where the medical marijuana is to be sold. A representative of LeBleu Fields shall not sell, serve, or distribute medical marijuana at any time other than the designated hours of operation.

A Certified Physician who makes patient referrals to a licensed medical marijuana center shall not receive anything of value from the medical marijuana center licensee or its agents, servants, officers, or owners or anyone financially interested in the licensee, and it shall be unlawful for a representative of LeBleu Fields to offer anything of value to a physician for making patient referrals to the licensed medical marijuana center.

Infractions of these rules are subject to disciplinary action up to and including termination.



## **5.2 DUTY TO REPORT OFFENSES**

Any employee, and any associated or key persons to a licensee, must make written notification to the AMCC of any criminal conviction and criminal charge pending against such person within ten (10) days of such person's arrest, summons, or conviction. This notification requirement shall not apply to non-felony traffic violations unless the violations result in suspension or revocation of a driver's license, the violations are based on allegations of driving under the influence or impairment of intoxicating liquor or drugs, or result in the person being taken into custody. Failure to make proper notification to the AMCC may be grounds for a disciplinary action up to and including termination.

Employees must report within three (3) business days, any criminal actions, licensee rule violations or other suspicious acts involving the sale, cultivation, distribution or manufacturing of medical marijuana by any person to the AMCC and shall cooperate in subsequent investigations. If an employee or contractor is discharged for alleged violations of the law or these regulations, the employee will surrender their occupational license.

## **SECTION 6**

### **EMPLOYEE PAY**

#### **6.1 PAY EQUITY**

The company is committed to fair pay practices and equal pay. We commit to assign consistent wages regardless of an employee's gender, race, national origin, citizenship or any other protected status.

Rate adjustments are typically discussed during the employee's annual review and depend on factors such as employee performance, experience, market adjustments, and financial sustainability. The company reserves the right to

decline or approve any increases at any time. Le Bleu Fields does not grant “cost of living” increases.

## 6.2 TIMEKEEPING

Accurately recording time worked is the responsibility of every non-exempt employee. Time worked is the time actually spent on a job(s) performing assigned duties.

LeBleu Fields does not pay for extended breaks or time spent on personal matters.

The time clock is a legal instrument. Altering, falsifying, tampering with time records, or recording time on another employee’s time record will result in disciplinary action, including termination of employment.

Authorized personnel will review time records each week. Any changes to an employee’s time record must be approved by his/her supervisor. Questions regarding the timekeeping system or timecards should be directed to the supervisor.

**Timecard Badge** – Non-exempt employees will be issued a timecard badge on their first day of employment. The employee will be given thorough instructions on usage and what to do should a problem occur.

Exempt employees are not eligible for overtime and are responsible for working the hours necessary to meet the responsibilities outlined in their job description.

## 6.3 OVERTIME

Overtime compensation is paid to non-exempt employees in accordance with federal and state wage and hour restrictions. Overtime is payable for all hours worked over 40 per week at a rate of one and one-half times the non-exempt employee's regular

hourly rate. Time off, holidays, or any leave of absence will not be considered hours worked when calculating overtime.

All overtime work performed by an hourly employee must receive the supervisor's prior authorization. Overtime worked without prior authorization from the supervisor may result in disciplinary action.

#### **6.4 PAYDAYS**

All employees are paid every other Friday, 26 pay periods/year.

If a regular payday falls during an employee's vacation, the employee's paycheck will be available upon his/her return from vacation.

Direct deposit is available, authorizations forms for deposit will be provided by Human Resources.

Paychecks are available at your main work site location.

Paychecks will not, under any circumstances, be given to any person other than the employee without written authorization. Paychecks may also be mailed to the employee's address upon request.

LeBleu Fields withholds income tax from all employees' earnings and participates in FICA (Social Security) and Medicare withholding, and matching programs as required by law.

Upon voluntary separation of employment your final paycheck will be mailed to the employee's address of record.

#### **6.5 PAY DEDUCTIONS**

LeBleu Fields will deduct federal and state income taxes, social security and Medicare/Medicaid taxes, insurance elections, garnishments and other authorized deductions from an employee's gross pay.

State and federal laws require the company to honor garnishments of employee wages (including child support) as a court or legal judgment may instruct. Deductions will be itemized on an employee paycheck stub. Any questions regarding deductions should be directed to Human Resources.

## **SECTION 7**

### **EMPLOYMENT BENEFITS**

#### **7.3 HOLIDAYS OBSERVED – STORE CLOSURES**

LeBleu Fields is open as designated by the AMCC.

#### **7.4 HOLIDAY PAY**

Scheduled employees working any of the following holidays will be paid time and a half.

New Year's Day, Easter, Memorial Day, Labor Day, 4<sup>th</sup> of July, Thanksgiving (½day) Christmas.

#### **7.5 PAID TIME OFF**

LeBleu Fields provides paid time off (PTO) to full time employees to attend to personal matters and for vacation. The company's (PTO) benefits are described below:

**EXEMPT SALARIED employees receive allotted PTO per calendar year:**

Exempt salaried employees will receive 40 hours (5 Days) of PTO at the first of each calendar year.

**FULL-TIME HOURLY employees accrue the following per pay period:**

After 12 months of employment, non-exempt employees will begin accruing PTO. Full-time employees (32+ hours or more per week) will accrue 0.019231 PTO hours per each hour worked. **Full-time hourly employees will not accrue any PTO in their first 365 days of employment.**

Hourly employees PTO will have a cap of 40 hours and there is no reset date, as PTO carries over from year-to-year, with a max cap of 40 hours.

You must submit PTO requests to your manager and do so in advance. If you do not receive written authorization, you will not be compensated for your time off. Requests will be evaluated based upon various factors, including business needs, seniority and staffing considerations, during the proposed period of absence.

## **7.6 PAID PARENTAL LEAVE POLICY**

After successfully completing (12) months of full-time employment, Employees at LeBleu Fields are eligible for Paid Maternity Leave, for up to four (4) weeks in a twelve-month period following the birth of a child, adoption of a child, or placement of a foster child in their home. Employees at LeBleu Fields are eligible for Paid Paternity Leave, for up to two (2) weeks in a twelve-month period following the birth of a child, adoption of a child, or placement of a foster child in their home.

## SECTION 8

### INSURANCE

#### 8.1 – OVERVIEW

Health, dental, and vision insurance are offered to full-time employees. Any premium costs for spouses and/or dependents are the responsibility of the employee. LeBleu Fields will pay up to 75% of employees' health insurance only.

Should you wish to elect any of the offers, the coverage period begins the 1<sup>st</sup> of the month following 90 days of employment. Human Resources will contact you when you are eligible to enroll. If you decline coverage after 90 days of employment your opportunity to elect coverage will occur during the next open enrollment period. Upon separation of employment, the company has the right to collect any outstanding premiums.

#### 8.2 – COSTS AND DEDUCTIONS

Each bi-weekly paycheck will deduct approximately half of the premiums cost associated with selected coverages for you and your dependents. Deductions begin on the first payroll after your application(s) have been accepted by the associated insurance carriers for each type of coverage you elected.

*If insurance costs cannot be deducted from your payroll check then all or any remaining balances become the sole responsibility of the employee. Failure to pay insurance premiums can result in revocation of all or part of your insurance coverage(s).*

## **SECTION 9**

### **EMPLOYEE COMMUNICATIONS**

#### **9.1 EMPLOYEE INFORMATION AND UPDATE**

A bulletin board provides employees access to important posted information and announcements. The employee is responsible for reading necessary information posted on the bulletin boards.

#### **9.2 PROCEDURE FOR HANDLING COMPLAINTS**

Under normal working conditions, employees who have a job-related problem, question or complaint should first discuss it with their immediate supervisor. At this level, employees usually reach the simplest, quickest, and most satisfactory solution. If the employee and supervisor do not solve the problem, Le Bleu Fields is committed to resolving the issue with another supervisor.

It is the employees' responsibility to ensure they are aware of the rules as they change.

## **SECTION 10**

### **SOCIAL MEDIA**

#### **10.1 INTRODUCTION**

Social media use should comply with Le Bleu Field social media policy. Employees are required to review and sign for receipt of the social media policy at time of hire.

All social media should adhere to the policy, is subject to management review and all applicable state laws

## 10.2 CONDUCT

Inappropriate postings that may include discriminatory remarks, harassment, and threats of violence or similar inappropriate or unlawful conduct will not be tolerated and may subject you to disciplinary action up to and including termination.

Always be fair and courteous to fellow associates, customers, members, vendors or people who work on behalf of LeBleu Fields. Also, keep in mind that you are more likely to resolve work related complaints by speaking directly with your co-workers or by utilizing our procedure for handling complaints rather than by posting complaints to a social media outlet. Nevertheless, if you decide to post complaints or criticism, avoid using statements, photographs, video or audio that reasonably could be viewed as malicious, obscene, threatening or intimidating, that disparage customers, members, associates or suppliers, or that might constitute harassment or bullying. Examples of such conduct might include offensive posts meant to intentionally harm someone's reputation or posts that could contribute to a hostile work environment on the basis of race, sex, disability, religion or any other status protected by law or company policy.

### **Be honest and accurate**

Make sure you are always honest and accurate when posting information or news, and if you make a mistake, correct it quickly. Be open about any previous posts you have altered. Remember that the Internet archives almost everything; therefore, even deleted postings can be searched. Never post any information or rumors that you know to be false about Le Bleu Fields, fellow associates, members, customers, suppliers, and people working on behalf of Le Bleu Fields or its competitors.

### **Post only appropriate and respectful content**

Maintain the confidentiality of LeBleu Fields trade secrets and private or confidential information. Trade secrets may include information regarding the



development of systems, processes, products, know-how and technology. Do not post internal reports, policies, procedures or other internal business-related confidential communications.

Do not create a link from your blog, website or other social networking site to a LeBleu Fields website without identifying yourself as a LeBleu Fields associate. Express only your personal opinions. Never represent yourself as a spokesperson for LeBleu Fields. If LeBleu Fields is a subject of the content you are creating, be clear and open about the fact that you are an associate and make it clear that your views do not represent those of LeBleu Fields, fellow associates, members, customers, vendors or people working on behalf of LeBleu Fields. If you do publish a blog or post online related to the work you do or subjects associated with Le Bleu Fields, make it clear that you are not speaking on behalf of LeBleu Fields. It is best to include a disclaimer such as “The postings on this site are my own and do not necessarily reflect the views of LeBleu Fields.”

### **Using social media at work**

Refrain from using social media while on work time or on equipment we provide, unless it is work-related as authorized by your manager or consistent with the Company Equipment Policy. Do not use LeBleu Fields email addresses to register on social networks, blogs or other online tools utilized for personal use.

### **Retaliation is prohibited**

LeBleu Fields prohibits taking negative action against any associate for reporting a possible deviation from this policy or for cooperating in an investigation. Any associate who retaliates against another associate for reporting a possible deviation from this policy or for cooperating in an investigation will be subject to disciplinary action, up to and including termination.

## **10.3 MEDIA CONTACTS**

Associates should not speak to the media on LeBleu Fields’s behalf without contacting LeBleu Fields’s executive staff. All media inquiries should be directed to the executive staff or owners.

**LE BLEU FIELDS  
EMPLOYEE HANDBOOK  
ACKNOWLEDGEMENT**

PLEASE READ THIS HANDBOOK IN ITS ENTIRETY, SIGN THIS PAGE AND RETURN TO LE BLEU FIELDS' HR DEPARTMENT WITHIN 7 DAYS OF YOUR HIRE DATE

*By signing below you are acknowledging that you have read, understand and agree to abide by this Employee Handbook.*

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Le Bleu Fields Employee Signature

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Date

---

Le Bleu Fields Representative Signature

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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.

*Aretha Dix*

Printed Name of Verifying Individual

*Owner*

Title of Verifying Individual

*Aretha Q. Brown-Dix*

Signature of Verifying Individual

*28 Dec 2022*

Verification Date

**23.1 – An overview of the steps to be taken in the dispensing process to provide high quality products and to ensure the safety, potency, stability, lifespan, and consistency among batches of the same product, whether as required by law or otherwise.**

**Quality Control and Assurance Overview**

Quality control of medical cannabis begins at the lab testing stage where cannabis products are tested using cannabis testing equipment for two primary reasons. First, to validate that they are safe for human consumption. Second, to ensure that they retain the correct potency needed to provide the desired medical outcome. Human safety is of paramount importance as far as the production of medical cannabis is concerned because cannabis gets exposed to heavy metals, toxins from chemicals, fertilizers, and microbes that can have severe negative impacts on human health. The final cannabis plant is then tested for any of such residual compounds, and if present, it is checked against the accepted maximum limits set by regulatory agencies designated by the AMCC.

During the lab testing process, cannabis scientists assess the phytochemical composition of the cannabis and their cannabinoid profile using liquid chromatography. Although other chromatography techniques can be used, liquid chromatography is the most preferred due to highly controlled purification standards.

Most notably in the production of pharmaceutical-grade cannabis products, quality control checks and balances must be carried out at every stage of the manufacturing process to get a good quality product. Also, quality control guarantees an excellent consumer experience and maybe an outstanding factor among cannabis brands.

Applicant considers the safety of its products and purchasers as a top priority. Dispensary will adhere to strict inventory control policy and procedure to ensure that all products are readily traced, tracked and accounted for in a timely manner as we receive products from vendors. By using a state of the art inventory management and control system, precise record keeping and standard operating procedures the applicant will be able to quarantine and recall and destroy any products required by the AMCC pursuant to the Act. Written policies and procedures will be readily available at the dispensary and will include methods for identifying, recording, and reporting errors and inaccuracies in inventories received.

**23.2 – A plan for performing, at its own expense after licensure, quality control and testing of a qualified sampling**

**Quality Control Unit**

The Applicant shall have a quality control unit that is responsible to approve or reject all components, product containers, closures, in-process materials, packaging materials, labeling and cannabis products. The quality control unit shall have the authority to review production records to determine if errors have occurred and investigate to correct any errors, in an paramount effort to ensure the safety, potency, stability, lifespan, and consistency among all batches tagged with an identifying number which correlates to the seed to sale software (BioTrackTHC) as well as METRC required by the AMCC. The quality control unit is responsible for approving or rejecting products produced, processed, packaged, or held under contract by another establishment. The quality control unit is responsible for approving or rejecting all procedures regarding extraction and other techniques which impact the identity, strength, quality and purity of the cannabis.

This quality control unit shall be the Facility Coordinator, Inventory Manager and designated employees and shall meet monthly. The Inventory Manager shall work with the other members to review the techniques utilized and refine such techniques to ensure high-grade cannabis products are dispensed.

Applicant's Inventory Management system and Point of Sale system will track and record each transaction from intake at our dispensary through to the time of sale, including the date of intake/sale, amount purchased/sold, the purchase price paid for the product by the Applicant, and the purchase price paid by the customer. The software will track, analyze and ensure compliance pertaining to distribution, and sale of cannabis products. Applicant understands that proper inventory management of all cannabis products allows for the ability to quickly quarantine and recall products.

Chain of custody of the products must be maintained once the product enters the facility and exits through the front door. When cannabis or cannabis-infused products are

packaged, an assigned number travels with it. Each individual product or package is flagged with a unique batch identification number. All products or containers thus bear a control number that makes it possible to determine the complete manufacturing history of the associated item. This gives Applicant access to the complete manufacturing history of any item that is or ever has been in our dispensary. Real-time information regarding the processing, packaging, sale, return, and disposal of inventory is entered into the Inventory Control System, creating a comprehensive data management system. Inventory Controls will track the following information, at a minimum:

1. All strains and quantities that are available and approximately when additional strains and quantities will be available;
2. Timely alerts regarding the occurrence of low inventory on any particular strain;
3. Timely warnings regarding any possible over purchasing;
4. All recalled Cannabis;
5. All Cannabis designated for disposal, and;
6. All Cannabis previously already disposed of;
7. Future projections regarding product availability
8. All products currently in transit and its destination;
9. Current inventory levels at our dispensary; and
10. Accurate amount of Cannabis sold and the applicable time, date of sale

When Applicant receives cannabis or cannabis-infused products, batch numbers will be included in the applicant's POS barcode. These numbers will cross-reference the source dispensary's unique registry identification number and be permanently linked to all the information Applicant obtained about the cannabis from the source along with other legally required information. The record then includes:

1. The amount acquired, its strain, and any other descriptive information.
2. Original batch and tracking number.
3. Name and registry identification number of the dispensary and dispensary agent providing the Cannabis.

4. Name and registry identification number of the dispensary agent receiving the Cannabis on behalf of our dispensary.
5. Date of acquisition.

This information is vital should Applicant have to recall a product. Applicant's training in BioTrackTHC includes step by step instructive narrative for clear and concise inventory control. Agents will have full knowledge and understanding of the following BiotrackTHC Inventory and recordkeeping and POS procedures. Applicant will use the same barcodes for inventory and sales that will be used for recall.

The Applicant will complete daily inventory verifying that all products are accounted for in the system. The Inventory agent will check the state website along with applicant email every morning to check for alerts of recalled products. The department may also recall products of the state tracking system by putting entire batches on hold. As soon as any agent has been alerted that a batch was put on hold. The Inventory team will alert both the security and compliance departments. Should a recall event occur, or the Department issues a voluntary recall, our company has developed a policy and protocols for recalling products that were released into the market that pose any risk or hazard to our customers.

Members of the quality control unit will also examine packaged and labeled products to provide assurance that the containers and packages have the correct labels, collect a representative sample to ensure correct labeling and record the results of the examination of the labeling in a form developed by the quality control unit. The Quality Control Unit shall exercise strict control over labeling materials issued for lot identity and conformity to the labeling specified in applicable production. Only products that are packaged and labeled in a manner approved by the Quality Control Unit shall be sold.

Inventory Manager shall authorize receipt of the same and ensure that the items are properly stored, handled, sampled, and tested. If not appropriate, the Inventory manager shall reject the items.

A cannabis establishment is responsible for the content and quality of any cannabis



product sold or dispensed by the cannabis establishment.

**23.3 – A plan for return and remediation or destruction of any failed test samples, including entry of the event on the Statewide Seed-to-Sale Tracking System.**

**Return, Remediation, or Destruction of failed Test Samples**

The purpose of the Chief Inventory Officer is to assist the Compliance Agent with daily, weekly, and monthly inventory tasks. As the inventory department grows, this agent will have up to two agents employed under them. The agents will conduct oversight on daily audits and purchasing and receiving of incoming transfers. BioTrack software in conjunction with security measures will ensure strict control and accountability of all inventory and inventory movement electronically. Dispensary will have records, journals and logs at strategic locations that coincide with the inventory movement. The Chief Inventory Officer will be responsible for creating inventory logs. These written records ensure accountability and are useful tools for double checking the physical and electronic inventory. The Chief Inventory Officer in charge will use both written records and electronic records to perform audits.

The Compliance Agent can be accessed 24 hours a day via the contact information listed at the building entrance and is given to any vendor that the dispensary purchases from, and to our dispensary Agents for reporting any concerning issues. Compliance Agent will immediately assess the risk when a situation arises which has the potential of resulting in a recall action. The Compliance Agent will inform the Inventory Agent in charge of the recall action and the affected lots immediately. Sales will be suspended on the product immediately using the point of sale system. The recall will be issued for the entire product batch.

The Compliance Agent will manage BioTrack inventory data while designating physical records to the products. Products will be placed in a designated area within a restricted access room, away from other products and clearly labeled. Signs will be posted stating products are On-Hold. The signs designating items that have been recalled will state, in

bold lettering, “ON HOLD - CANNABIS PRODUCT RECALL” and will note the cultivar and brand name, lot number, origination number, and quantity on hold. The Compliance Agent will investigate the situation and assess the extent of corrective action required.

Consideration is also given to other lots that may be affected. If a recall action is deemed necessary by the Compliance Agent in Charge, then the Compliance Manager will access the distribution records from BioTrackTHC, to retrieve vendor registration, purchase orders, and distribution records within 24 hours of initiation of the recall.

Next, the Compliance Agent in Charge will inform the Department of Finance and Professional regulation, the Department of Agriculture, and the Department of Public Health, within 24 hours of discovering defective or suspected defective product of the recall action at 800-252-1818 and in writing to the AMCC within 24 hours of the recall action.

The Applicant understands that all government and state agencies will request information from the applicant as part of the recall within 24 hours. The Applicant will provide the Health Department with the following information:

1. Brand name and lot number of the product
2. Reasons for commencing the recall
3. Total quantity produced by the licensed producer
4. Total quantity that was sold or provided by the licensed producer
5. Total quantity remaining in possession of the licensed producer
6. The number of people whom the product was sold or provided by the licensed producer
7. Any other action taken by the licensed producer with respect to the recall.

Product will be quarantined (i.e. stored in a separate location from all other products until disposed of) if it has been tampered with, damaged, or opened. Product will also be quarantined if product is returned or recalled. As a recall notification plan is in action the Inventory Agent in Charge along with the security agent in charge will

quarantine current inventory of recalled products. The Inventory agent in charge will complete an incident report. All directors and managers will be informed of the product in quarantine, quarantine products will be stored within the vault with a locked secure area.

## 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.

*Aretha Dix*

Printed Name of Verifying Individual

*owner*

Title of Verifying Individual

*Aretha Q. Brown-Dix*

Signature of Verifying Individual

*29 Dec 2022*

Verification Date

Applicant considers the safety of its products and purchasers as a top priority. Dispensary will adhere to strict inventory control policy and procedure to ensure that all products are readily traced, tracked and accounted for should an adverse event such as a recall occur. In the event of a recall, Applicant will immediately implement procedures outlined herein to ensure a timely response. By using a state of the art inventory management, BioTrack inventory control system, precise recordkeeping and standard operating procedures the applicant will be able to quarantine and recall and destroy any products required by the Commission pursuant to the Act. Reporting recalls and destruction of product to the AMCC will be completed pursuant to the regulations prescribed by the state of Alabama.. This plan will include Applicants recall practices, quarantine practices, destruction practices as well as procedures to mitigate or avoid danger to the public. Written policies and procedures will be readily available at the dispensary and will include methods for identifying, recording, and reporting diversion, theft, or loss for correcting errors and inaccuracies in inventories. Such policies and procedures will be reviewed at least once every 12 months from the date Applicant's license is issued, and more frequently on an as needed basis.

**24.1 - Provisions for notifying originating Processor or Integrated Facility**

Applicant's Inventory Management system and Point of Sale system will track and record each transaction from intake at our dispensary through to the time of sale, including the date of intake/sale, amount purchased/sold, the purchase price paid for the product by the Applicant, and the purchase price paid by the customer. The software will track, analyze and ensure compliance pertaining to distribution, and sale of cannabis products. Applicant understands that proper inventory management of all cannabis products allows for the ability to quickly quarantine and recall products. Chain of custody of the products must be maintained once product enters the facility and exits through the front door. When cannabis or cannabis-infused products are packaged, an assigned number travels with it. Each individual product or package is flagged with a unique batch identification number. All products or containers thus bear a control number that makes it possible to determine the complete manufacturing history of the associated item. This gives Applicant access to the complete manufacturing history of any item that is or ever has been in our dispensary. Real-time information regarding the processing, packaging, sale, return, and

disposal of inventory is entered into the Inventory Control System, creating a comprehensive data management system. Inventory Controls will track the following information, at a minimum:

1. All strains and quantities that are available and approximately when additional strains and quantities will be available;
2. Timely alerts regarding the occurrence of low inventory on any particular strain;
3. Timely warnings regarding any possible over purchasing;
4. All recalled Cannabis;
5. All Cannabis designated for disposal, and;
6. All Cannabis previously already disposed of;
7. Future projections regarding product availability
8. All products currently in transit and its destination;
9. Current inventory levels at our dispensary; and
10. Accurate amount of Cannabis sold and the applicable time, date of sale.

When Applicant receives cannabis or cannabis-infused products, batch numbers will be included in the applicant's POS barcode. These numbers will cross-reference the source dispensary's unique registry identification number and be permanently linked to all the information Applicant obtained about the cannabis from the source along with other legally required information. The record then includes:

1. The amount acquired, its strain, and any other descriptive information.
2. Original batch and tracking number.
3. Name and registry identification number of the dispensary and dispensary agent providing the Cannabis.
4. Name and registry identification number of the dispensary agent receiving the Cannabis on behalf of our dispensary.
5. Date of acquisition. This information is vital should Applicant have to recall a product.

Applicant's training in BioTrack includes step by step instructive narrative for clear and concise inventory control. Agents will have full knowledge and understanding of the following Biotrack Inventory and recordkeeping and POS procedures. Applicant will use the same barcodes for inventory and sales that will be used for recall.

The Applicant will complete daily inventory verifying that all products are accounted for in Exhibit 24 Contamination and Recall Plan

the system. Inventory agent will check the state website along with applicant email every morning to check for alerts of recalled products. The Commission may also recall products of the state tracking system by putting entire batches on hold. As soon as any agent has been alerted that a batch was put on hold. The Inventory team will alert both the security and compliance departments. Should a recall event occur, or the Commission issues a voluntary recall, our Dispensary has developed a policy and protocols for recalling products that were released into the market that pose any risk or hazard to our customers.

**24.2 - Factors about an adverse event that would likely necessitate a recall, and any potential for retesting or remediation.**

1. The discovery of use of an unapproved, banned, or unsafe pesticide or substance used in production.
2. The presence of mold, or fungi in products.
3. A product item becoming unsafe, i.e. an unsafe vaporizer coil, oil cartridge, etc.
4. Reports of adverse effects or illness occurring from consumption of product.
5. Test results showing salmonella, e.coli, aspergillus or any other toxins.
6. Issues arising from improper storage, shipping or handling.
7. Lack of adherence to good production practices.

**24.3 - Responsible Individuals who will oversee the recall process.**

The Compliance Agent will manage BioTrack inventory data while designating physical records to the products. Products will be placed in a designated area within a restricted access room, away from other products and clearly labeled. Signs will be posted stating products are On-Hold. The signs designating items that have been recalled will state, in bold lettering, "ON HOLD - CANNABIS PRODUCT RECALL" and will note the cultivar and brand name, lot number, origination number, and quantity on hold. The Compliance Agent will investigate the situation and assess the extent of corrective action required. Consideration is also given to other lots that may be affected. If a recall action is deemed necessary by the Compliance Agent in Charge, then the Compliance Manager will access the distribution

records from BioTrack, to retrieve vendor registration, purchase orders, and distribution records within 24 hours of initiation of the recall.

#### **24.4 - Notification Protocols**

The Compliance Agent will inform the Inventory Agent in charge of the recall action and the affected lots immediately. Sales will be suspended on the product immediately using the point of sale system, BioTrack. The recall will be issued for the entire product batch.

#### **24.5 - Processes to ensure that the recalled product is returned, remediated (and ultimately approved as safe), or destroyed.**

The Compliance Agent in Charge reviews the information on the On-Hold Recall sign, and signs and dates. The Compliance manager or Agents affixes the On-Hold Recall Sign to the container holding the recalled product, which then places it “on hold.” While the product(s) are on hold, no other product will be stored within the safe where “ON-Hold” is kept. The Applicant will reasonably strive to keep no on-hold product on site for more than calendar seven (7) days; however the applicant understands that the Department investigations may take longer than that allotted time. If a recall action or destruction action is not deemed necessary, then any required corrective action will be taken, and the product will be released by the Compliance Manager. The On-Hold Recall Sign is removed from the product and a release sign put on the product. As the Applicant will strive to make sure all actions taken are documented accordingly and correspond with BioTrack processing. All recalled product, tampered with, damaged, expired, or returned product will be documented in BioTrack and will be destroyed in accordance with the Cannabis Tax Act and Department regulations. In accordance with the state of Alabama, Applicant will establish an account with the State's verification system that documents the disposal of cannabis, including: (i) a description of the products, including the quantity, strain, variety, batch number, and reason for the cannabis being disposed; (ii) the method of disposal; and (iii) the date and time of disposal. Destruction and disposal will be completed onsite by the agent in charge and will be filmed under camera surveillance. The following steps will be followed by an inventory agent in the presence of another agent in charge on camera in a designated waste destruction area. All destruction of cannabis products will be completed outside of



operational hours. Agents will use the following tools for waste destruction: a blender, coffee grinder, soil, hammer or hot water heater. Agents should review the chart below to determine which destruction tool will be best to destroy the cannabis product.

**Destruction Tool Cannabis Product:**

Hammer - Cannabis Concentrates

Soil - Cannabis Flower, Cannabis Edibles, Cannabis Topicals

Coffee Grinder - Cannabis Flower, Cannabis Edibles, Cannabis Concentrates

Hot Water Heater - Cannabis Concentrates, Cannabis Topicals

Blender - Cannabis Edibles, Cannabis Flower

**24.6 - Processes to report to the Commission and any other appropriate regulatory body regarding crisis response and steps taken to mitigate or avoid danger to the public.**

The Compliance Agent in Charge will inform the Department of Finance and Professional regulation, the Department of Agriculture, and the Department of Public Health, within 24 hours of discovering defective or suspected defective product of the recall action at and in writing to the Department within 24 hours of the recall action. The Applicant understands that all government and state agencies will request information from the applicant as part of the recall within 24 hours. The Applicant will provide the Health Department with the following information:

1. Brand name and lot number of the product
2. Reasons for commencing the recall
3. Total quantity produced by the licensed producer
4. Total quantity that was sold or provided by the licensed producer
5. Total quantity remaining in possession of the licensed producer
6. The number of people whom the product was sold or provided by the licensed producer
7. Any other action taken by the licensed producer with respect to the recall.

**24.7 - Steps to be taken to further avoid contamination**

The applicant will take direction from the Department on whether or not products will be able to be received back into the dispensary as a customer return. If a product is returned to the dispensary, agent retrieves the returned package from the sales area. A credit will be issued to the customer for their purchase of the recalled product(s). Once the product has been received into the Day of inventory room the following information will be recorded on the Returned Goods Form about the return.

1. Recall notice date;
2. Time of Return
3. Amount of product removed from inventory;
4. Amount of customer returned product that is unopened;
5. Amount of customer returned product that is opened;
6. Product SKU including batch number
7. Disposition of product.

The Compliance Agent in Charge reviews the information in the Returned Goods Form, and signs and dates. A copy is made of the form.

The Compliance Agent in Charge or staff records the following information on the On-Hold Recall Sign which states "On Hold - CANNABIS PRODUCT RECALL":

1. The cultivar and brand name (if applicable)
2. Lot Number, and
3. Quantity.

Returns are reconciled as per Inventory Control. The Compliance Agent will review the traceability to confirm what is left out in circulation. Then the On-Hold products are scheduled for destruction when data is inputted and verified with the tracking systems of BioTrack.

#### **24.8 - Investigation and Analysis of factors that lead to the recall.**

An investigation into the inaccurate results and reporting will result in additional public health and safety bulletins. Applicant will retain samples of each lot or batch of a finished product made available for sale or provision by the licensed producer in sufficient quantities to determine whether the lot or batch poses a risk to the health of an individual who has obtained product(s) for medical purposes. If a recall action is deemed necessary by Exhibit 24 Contamination and Recall Plan

the Compliance manager, the Compliance manager accesses the distribution records from METRC to retrieve the client registration, orders and distribution within 24 hours of initiation of the recall. All customers who received the product in question are notified by phone, text, or e-mail of the recall. This will be followed by an Urgent Recall Action Letter which will be required from the customer. Three attempts will be made to contact the customer, last of which will be a phone call with a follow up email (if an email address is available). In both cases, the following information is provided:

1. Description of the product by cultivar/brand name, lot number, reason for the recall.
2. Instructions to stop any further use or sale of the product and to inform any of its accounts of the recall action.
3. Instructions as to what to do with the contaminated product.
4. Inform the client of any safety measures to be taken in case the product was used.

## 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.

*Aretha Dix*  
Printed Name of Verifying Individual

*DIRECTOR*  
Title of Verifying Individual

*Aretha Q. Brown-Dix*  
Signature of Verifying Individual

*28 Dec 2002*  
Verification Date

As cannabis becomes increasingly accepted across the United States, more and more businesses are getting involved in the cannabis industry. And with any business, marketing is a key component to successfully operating a cannabis business. But because cannabis is such a new and regulated industry, marketing a cannabis business can be tricky.

Laws and regulations are different in each state as, for example, some types of advertising might not be allowed. In the online world, Facebook, Instagram, and Google also have their limitations, but offer certain advertising opportunities for cannabis businesses.

Even with these restrictions, we can still find options to advertise and market our cannabis business. We will work within the AMCC regulations as well as cannabis marketing experts who are familiar with all the rules and can help make a detailed marketing plan.

**25.1 – Any proposed logos, branding, messaging, or other marketing or advertising communications**

Applicant is applying as LeBleu Fields:

Applicant shall not engage in Advertising that is deceptive, false, or misleading. Applicant shall not make any deceptive, false, or misleading assertions or statements on any product, any sign, or any document provided to a consumer. We have experience in reaching customers organically through the dissemination of quality products as well as quality information. Applicant prides itself on truly helping our consumers achieve a high level of satisfaction at the root level, meaning we specifically target groups of individuals who will highly benefit through the use of medical marijuana products.

Applicant shall not utilize television advertising as the AMCC has not provided means to do within the current regulations.

Applicant shall not engage in radio advertising unless the Dispensary has reliable evidence that no more than 30 percent of the audience for the program on which the Advertising is to air is reasonably expected to be under the age of 21.

Exhibit 25 Marketing and Advertising Plan

Applicant shall not engage in Advertising in a print publication unless the Dispensary has reliable evidence that no more than 30 percent of the publication's readership is reasonably expected to be under the age of 21.

Applicant shall not engage in Advertising via the internet unless the Retail Marijuana Establishment has reliable evidence that no more than 30 percent of the audience for the internet web site is reasonably expected to be under the age of 21.

Applicant shall not engage in Advertising that specifically targets Persons located outside the state of Alabama.

Applicant may advertise that its products have been tested by a State Approved Lab Facility, but shall not engage in Advertising or utilize signage that asserts its products are safe because they are tested.

A. Local Ordinances. In addition to any requirements within these rules, the Dispensary shall comply with any applicable local ordinances regulating signs and Advertising.

B. Outdoor Advertising Generally Prohibited. Except as otherwise provided by the AMCC, it shall be unlawful for any Dispensary to engage in Advertising that is visible to members of the public from any street, sidewalk, park or other public place, including Advertising utilizing any of the following media: any billboard or other outdoor general Advertising device; any sign mounted on a vehicle, any hand-held or other portable sign; or any handbill, leaflet or flier directly handed to any person in a public place, left upon a motor vehicle, or posted upon any public or private property without the consent of the property owner.

C. Exception. The prohibitions set forth in this rule shall not apply to any fixed sign that is located on the same zone lot as the Dispensary and that exists solely for the purpose of identifying the location of the Dispensary and otherwise complies with any applicable local ordinances.

Applicant shall not include in any form of advertising or signage any content that specifically targets individuals under the age of 21, including but not limited to cartoon characters or similar images.

Applicant not utilize unsolicited pop-up advertising on the internet.

Applicant may sponsor a charitable, sports, or similar event, but Applicant shall not engage in advertising at, or in connection with, such an event unless the Dispensary has reliable evidence that no more than 30 percent of the audience at the event and/or viewing Advertising in connection with the event is reasonably expected to be under the age of 21.

As you can see, there are many different types of cannabis marketing that we can use to reach potential customers. When choosing a cannabis marketing strategy, we will choose one that aligns with our brand identity. By doing this, Applicant will be able to reach our target audience and promote our products or services in the most effective way possible.

### **Brand Identity**

Just like with any other business, developing a strong brand identity is essential for cannabis businesses. Our brand will reflect our company's values and be consistent across all of our marketing materials. Applicant will have a recognizable visual identity, a flawless website and storefront (both online and offline).

Our core principles as an organization consist of patients first, consistency as well as verifiable knowledge through our staff to deliver quality results for our patients. Applicant has a very experienced, well trained personnel to communicate our brand.

A strong brand will make the Dispensary more recognizable to our target market and help build trust with potential customers. That's why every aspect of our operations, including our employees and the way they interact with customers, needs to reflect our brand values.

### **25.2 - Any specific media outlets or platforms where the marketing or advertising campaigns or programs will be utilized.**

Ad Policy & Guidelines by AMCC will determine to what extent we may market within these platforms. Applicant will check often to stay on top of ever-evolving rules of engagement.

### **EXCERPTED RULES & GUIDELINES REFERENCE**

**Facebook** Ads must not promote the sale or use of illegal, prescription, or recreational drugs. Due to federal restrictions, cannabis companies are prohibited from running ads even in states where cannabis is legal. Fail to comply with platform advertising guidelines and Facebook can shut down your ads and/or delete your account without notice.

**Instagram** Community Guidelines require you to share only content that you've created or have the legal right to share. That content cannot directly advertise or sell marijuana, regardless of your state or country. Instagram policies generally mimic those of parent company Facebook.

**Twitter** policy prohibits ads for illegal goods. The Drugs and Drug Paraphernalia section specifically lists "illegal drugs, recreational and herbal drugs, accessories associated with drug use, drug dispensaries, and depictions of hard drug use" as examples of prohibited ad content.

**Pinterest** Does not allow "imagery, sale or use of illegal or recreational drugs." Also, "informational material about the use or legalization of illegal or recreational drugs" and "related paraphernalia for using, storing or consuming illegal or recreational drugs." are also prohibited.

**LinkedIn** does not allow ads related to prescription pharmaceuticals, drugs or any related products or services. Ads that promote illegal drugs, highs, herbal medicines and treatments, psychoactive effects of substances, or aids to pass drug tests are all prohibited."

Applicant will maintain:

- Compliant with Platform Guidelines, Terms & Conditions
- Compliant with AMCC Laws • Compliant with Platform Guidelines, Terms & Conditions
- Regular legal counsel to stay on top of changing regulations World-Class International Standards

### **25.3 - The identity of any media outlet, social media platform, or third-party individual or entity which is projected to play any role in the Applicant's marketing**

Exhibit 25 Marketing and Advertising Plan



**or advertising efforts, and copies of all contracts or contract forms proposed for use, if any, between itself and such media outlet or third-party individual or entity.**

Currently the applicant has not entered into any contractual agreement for marketing and advertising.

And finally, we will always comply with AMMC cannabis laws when it comes to marketing our business.

## 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.

Aretha Dix

Printed Name of Verifying Individual

Yvette Q. Brown-Dix

Signature of Verifying Individual

Owner

Title of Verifying Individual

28 Dec 2022

Verification Date

**26.1 – A complete site map of each website owned or operated by the Applicant.**

Our current website address: LeBleuFieldsBusinessSolutions.com

**26.2 – The web address of each webpage, social media page, or other online site owned or operated by the Applicant.**

Social Media sites will be launched upon the award of licensure.

**Three must-haves for your brand’s social media marketing compliance strategy:**

1. Social Media Policy for Employees
2. Community Management Guidelines & Escalation Protocols
3. Legal Counsel (for brand and agency alike) to oversee full compliance with:
  - Cannabis category regulations
  - Truth-in-advertising standards and consumer protection laws
  - Social platform policies

**Social Media Compliance**

All social media content will comply with the regulations imposed by applicable federal, state, Alabama Medical Cannabis Commission as well as the guidelines of each respective social media platforms.

**Standards help protect against fraud and deception.**

- No false or misleading claims
- Cannot promote overconsumption
- Cannot depict consumption whatsoever in some states
- No health or therapeutic claims; no medical advice
- No cartoons, dancing animals, or imagery that appeals to children
- No games or competitions related to consumption
- Ensure employees know how to behave when representing your brand
- Create guidelines to respond to negative feedback
- Create protocols for crisis management

Countless cannabis brands are operating on social media as if the risk is low. They openly violate platform rules, not to mention state and federal laws. They build their business around a perceived lack of enforcement, never knowing if they've already been reported, flagged, or monitored for violations. Openly engaging in deceptive practices shows consumers (and regulators!) that your brand isn't trustworthy.

## **SOCIAL MEDIA POLICY**

**POLICY.** This social media policy provides guidelines for employee and independent contractor social media conduct, both when on behalf of LeBleu Fields (such as when managing a company account) as well as when using social media personally in reference to the company.

### **GUIDELINES.**

- I. Follow Company Policy. All employees must adhere to any provided employee guidelines (Code of Conduct, Employee Handbook, etc.) when using social media in reference to the company.
- II. Keep Accounts Separate. Employees are encouraged to keep personal and company-affiliated social media accounts separate and are discouraged from using personal social media during company time or on company equipment.
- III. Stay Transparent. When speaking about or on behalf of the company, be transparent about your relationship with the company.
- IV. Keep Confidentiality. Employees are: (check all that apply)
  - Allowed to post any information about the company as long as it is posted in a manner that does not have negative sentiment towards the company and does not garner a negative public reaction in accordance with the National Labor Relations Act.

- Prohibited from posting any information that is considered confidential or copyrighted without explicit, written permission.

- Other. [DESCRIBE]

V. Stay Respectful. Though not an exhaustive list, employees are strongly discouraged from posting anything illegal, federally or by state, defamatory, pornographic, harassing, libelous, or that might otherwise create a hostile work environment.

VI. Seek Permission. When on a company account, employees should get permission before posting media of current or former employees, vendors, members, suppliers, and the like. Similarly, employees should seek permission before using the copyrighted or trademarked material of a third party. When seeking permission for any item in this policy, the employee must obtain written permission from [SUPERVISOR'S NAME] ("Supervisor"). Said Supervisor can change at any time and, upon such change, this policy will be updated.

VII. Find a Representative. If an individual or entity approaches an employee asking for comment in reference to the company, they should refer said individual or entity to the Supervisor.

VIII. Ask for Help. Employees should seek the help of the Supervisor if they find themselves in a potentially antagonistic online conversation, if they come across any questionable content regarding the company online, if a customer contacts them on social media, or in any other situation in which they are uncertain about what to do, including basics like what is permissible to post and who needs to approve posts.

IX. Disciplinary Rights. Please be aware that we may see content and information publicly posted by employees on social media. On or off-hours online activity that violates company policy may result in disciplinary action or termination.

**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 of all partners, both general and limited; or if a limited liability company, the names and addresses of all members and managers.

Le Bleu Fields  
Business License Applicant Name

Dispensary  
License Type

**Ownership Entity Information**

Le Bleu Fields Business Solution  
Ownership Entity Name

100  
Ownership Entity % Ownership in Applicant

Ownership Entity Type:  Trust  Privately Held Corporation  Publicly Held Corporation  
 Partnership  Limited Liability Partnership  Limited Partnership  
 Limited Liability Limited Partnership  Limited Liability Company  
 Other (specify): \_\_\_\_\_

**Ownership Entity Owners**

Jablonski Frazier Owner [REDACTED]  
Owner Name Role % Ownership in Entity

[REDACTED]  
Street Address

[REDACTED]  
City State Zip

Aretha Dix Owner [REDACTED]  
Owner Name Role % Ownership in Entity

[REDACTED]  
Street Address

[REDACTED]  
City State Zip

Brenda Gunsallus

Owner

[Redacted] % Ownership in Entity

Owner Name

Role

[Redacted] Street Address

[Redacted] City

[Redacted] State

[Redacted] Zip

Darlene Davis

Owner

[Redacted] % Ownership in Entity

Owner Name

Role

[Redacted] Street Address

[Redacted] City

[Redacted] State

[Redacted] Zip

Diane Reilly

Owner

[Redacted] % Ownership in Entity

Owner Name

Role

[Redacted] Street Address

[Redacted] City

[Redacted] State

[Redacted] Zip

Rory Murphy

Owner

[Redacted] % Ownership in Entity

Owner Name

Role

[Redacted] Street Address

[Redacted] City

[Redacted] State

[Redacted] Zip

**Applicant Verification:** The undersigned hereby verifies that the information provided hereinabove (and attached, as necessary) constitutes a complete and accurate list of all individuals with an applicable ownership interest in an ownership entity with an ownership interest in the Applicant.

Aretha Dix

Printed Name of Verifying Individual

owner

Title of Verifying Individual

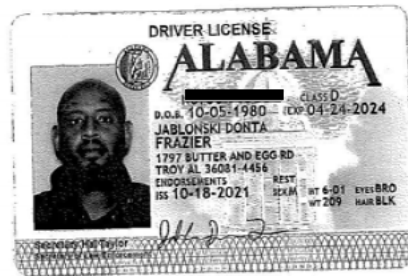
Aretha Q. Brown-Dix

Signature of Verifying Individual

28 Dec 2022

Verification Date

Minority Verification:





LM/WH/A/21E - 4/26/05  
initial " " - 4/26/05

FAX: (334)260-0502  
DATE: 04/21/2005

AUTHORIZATION NBR 05111007494



The spirit of working together.

KENNETH FARHA  
KENNETH F FARHA DDS  
2540 BELL ROAD  
MONTGOMERY AL 36117 4375

PHONE: (334)260-0501  
FAX#: (334)260-0502

**IMPORTANT**  
Return Discharge Summary or  
Operative Report/Consultation to:  
**FAX# (877)850-9599**  
  
Include this page as a  
coversheet for your fax

HUMANA MILITARY HEALTHCARE SERVICES --- TRICARE AUTHORIZATION

HMHS reviewed the request for authorization of services for the patient named below. HMHS authorizes you to provide only the services described below. If further information about this patient or procedure is required, please contact HMHS at (800)444-5445 Units shown below are total number visits or procedures covered by this authorization number.

BENEFICIARY INFORMATION: ARETHA DIX  
<SHCP>

SPONSOR ID: [REDACTED]  
PATIENT ID: [REDACTED]  
DOB: [REDACTED]

NO FACILITY SELECTED; SERVICES ARE AUTHORIZED IN PROVIDER'S OFFICE ONLY.

AUTHORIZED SERVICES:	UNITS:	BETWEEN DATES:
DENTAL PROCEDURES	1	04/15/2005 - 10/11/2005
DENTAL PROCEDURES	1	04/15/2005 - 10/11/2005

REASON FOR REFERRAL: TMD

Associated professional services required to provide the authorized services do not require separate authorization. This authorization is based on medical necessity; it does not guarantee payment. Payment is based on TRICARE eligibility and compliance with TRICARE policy.

If you plan to perform services not authorized above, Contact the Primary Care Manager (PCM) to obtain authorization. Failure to do so will result in either denial of your claim or a significant reduction in your reimbursement for services rendered. Please include the sponsor's SSN in any correspondence.

PRIMARY CARE MANAGER: MAXWELL 42ND MEDICAL GROUP  
REFERRAL MANAGEMENT OFFICE PHONE: (334)953-3368  
-----> FAX#: (877)850-9599

USE THIS FAX AS COVER SHEET

This transmittal is intended only for the use of the individual or entity to which it is addressed and contains Protected Health Information, which is CONFIDENTIAL. This information may only be used or disclosed in accordance with federal law, which contains penalties for misuse. If you are not the intended recipient of this transmission, you may not otherwise use or disclose the information contained in this transmission. If you received this transmission in error, please return the transmission to HMHS at 502-508-1907 and delete or destroy the information. Thank you.

CC: MAXWELL 42ND MEDICAL GROUP



11/4/2015

Patient chart - Patient: Aretha O Dix DOB: 09/14/1978 Ph...

PATIENT  
Aretha O Dix

FACILITY  
Dr. Kenneth F. Farha  
T (334) 260-0501  
F (334) 260-0502  
2640 Bell Road  
Montgomery, AL 36117

Patient identifying details and demographics

FIRST NAME	Aretha	SEX	Female	ETHNICITY	Not Hispanic or
MIDDLE NAME	O	DATE OF BIRTH	[REDACTED]		Latino
LAST NAME	Dix	DATE OF DEATH	-	PREF. LANGUAGE	English
SSN	[REDACTED]	PRN	[REDACTED]	RACE	Black or African American
				STATUS	Active patient

CONTACT INFORMATION

ADDRESS LINE 1	[REDACTED]	CONTACT BY EMAIL	[REDACTED]	SEND VOICE NOTIFICATIONS	Yes
ADDRESS LINE 2	[REDACTED]	HOME PHONE	[REDACTED]	SEND TEXT NOTIFICATIONS	Yes
CITY	[REDACTED]	MOBILE PHONE	[REDACTED]	SEND EMAIL NOTIFICATIONS	Yes
STATE	[REDACTED]	OFFICE PHONE	[REDACTED]		
ZIP CODE	[REDACTED]	OFFICE EXTENSION	[REDACTED]		

FAMILY INFORMATION

NEXT OF KIN	-	PATIENT'S MOTHER'S MAIDEN NAME	-
RELATION TO PATIENT	-		
PHONE	-		
ADDRESS	-		

PATIENT NOTES

Primary Insurance Company: TRICARE SOUTH REGION







**Cannas Capital Insurance Agency**

1657 Getty St.  
Muskegon Heights, MI

November 28 ,2022

Addressee: LeBleu Fields Solutions, LLC  
Address: 215 N. Perry St.  
Montgomery, Al, 36104

To Whom It May Concern:

The above business meets the necessary requirements for insurance coverage for up to \$2,000,000.00 aggregated protection under general liability, \$1,000,000.00 for products and operation, and worker's compensation in statutory amounts and limits, and employer liability in limits of not less than \$1,000,000 per incident.

The operation meet the qualifications for insurance and our company standards. With the intent to operation as a Cannabis Business all licensing requirements must be met to obtain all coverage.

Issue of full quote and premium amount will be providing within 60 days final licensing approval and binding.

Sincerely Yours,

*Cimone Casson*

Cimone Casson



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

STATE OF Alabama )  
 )  
Montgomery COUNTY )

Before me, the undersigned notary, did appear the Affiant, who after being by me first duly sworn, did state under oath as follows (please type or print legibly):

1. NAME OF ENTITY APPLYING FOR LICENSE: LeBlea Fields Business Solutions, LLC
2. NAME OF AFFIANT: Aretha Q. Dix
3. AFFIANT'S POSITION WITH APPLICANT: OWNER
4. AFFIANT IS THE APPLICANT'S (Check One):  
 Responsible Party     Contact Person  
*(The affidavit of BOTH individuals is required)*
5. TYPE OF LICENSE BEING SOUGHT BY APPLICANT (Check One):  
 Cultivator     Processor     Secure Transporter  
 Dispensary     Integrated Facility     State Testing Laboratory

6. On behalf of the Applicant, I do hereby affirm under oath as follows:

- a. I, the undersigned Affiant named in paragraph 2 above, am an adult, over the age of 19 years and competent to provide this Affidavit.  
AD INITIAL HERE
- b. In my position stated in paragraph 3 above, I have been duly authorized by the Applicant identified in paragraph 1 above (hereinafter, "Applicant") to provide this Affidavit.  
*(Attach a copy of the entity applicant's written authorization to this Affidavit.)*  
AD INITIAL HERE
- c. I understand and acknowledge that this Affidavit and the statements, information and documents or other exhibits accompanying it, are for the purpose of seeking one (1) license of the type specified in paragraph 5 above, on behalf of the Applicant. Neither I nor the Applicant are seeking a different Alabama Medical Cannabis license on behalf of any individual or any other entity.  
AD INITIAL HERE
- d. That all statements, information, documents and other exhibits provided in the Application are true and correct, based on my own personal knowledge and a diligent investigation by me. To the extent any information provided therein was heretofore outside my personal knowledge or ability to affirm, I have personally communicated with those within the Applicant's business who have such personal knowledge, whose duties



include knowledge of the facts stated and/or the integrity of the documents or other exhibits, and I am able, based on such communications, to attest to their currentness and accuracy. This I and the Applicant affirm under penalty of perjury and other applicable sanctions under the AMCC Rules and Alabama law.

AD INITIAL HERE

- e. Applicant understands and acknowledges that the license being applied for is a revocable privilege granted by this state and is not a property right, and that this Application likewise does not convey to, or otherwise entitle unto, the Applicant any rights to a license.

AD INITIAL HERE

- f. Applicant understands, acknowledges, and will continue to respect and comply with AMCC Rules regarding limited communication during the Application process.

AD INITIAL HERE

- g. Applicant consents to all background checks, examinations, inspections, and search and seizure by AMCC and law enforcement personnel during this Application process and afterward, to the extent a license is awarded.

AD INITIAL HERE

- h. Applicant has no economic interest, as defined in the AMCC Rules, in any other license or Application for license under the Darren Wesley "Ato" Hall Compassion Act, § 20-2A-1, et seq. Code of Alabama 1975.

AD INITIAL HERE

- i. I and the Applicant will at all times, to the best of our ability, comply with the AMCC Rules, and cooperate and maintain transparency with the AMCC, its staff and other agents.

AD INITIAL HERE

- j. Any verification provided in the Application is hereby affirmed under oath to be true and correct as of the date of the Application's submission.

AD INITIAL HERE

Matthew D. Brown, D.D.

Signature of Affiant

Acting for and on behalf of:

LeBlew Fields Business Solutions, LLC

Applicant

Sworn to and subscribed before me on this 28 day of December, 2022.

Robert Smith

Notary Public

My Commission Expires: 05-27-2024

[SEAL]